

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA, : CASE NO. 1:18-cr-0043
:
Plaintiff, :
vs. : IN-PERSON TRIAL
: PROCEEDINGS
YANJUN XU, also known as XU :
YANJUN, also known as QU HUI, : 22nd of OCTOBER, 2021
also known as ZHANG HUI, : 9:50 A.M.
:
Defendant. : DAY 5

TRANSCRIPT OF PROCEEDINGS
BEFORE THE HONORABLE TIMOTHY S. BLACK, JUDGE

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17 Stenographer: Julie Hohenstein, RPR, RMR, CRR
18 United States District Court
19 200 West Second Street
20 Dayton, Ohio 45402

21 Proceedings reported by mechanical stenography,
22 transcript produced by computer.

23 *** **

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1 P-R-O-C-E-E-D-I-N-G-S

9:50 A.M.

2
3 COURTROOM DEPUTY: All rise. This United States
4 District Court for the Southern District of Ohio is now in
5 session. The Honorable Timothy S. Black, United States
6 District Judge, presiding.

7 THE COURT: Thank you. Please be seated. We are
8 back in the open courtroom. Ten of 10 on the record.
9 Outside the presence of the Jury in the United States versus
10 Xu.

11 Government team is present. Defense team is
12 present. Defendant's present. Both translators. One's in
13 the courtroom. One's on the phone, and we are ready to
14 proceed from my perspective.

15 I regret the delay. I am entirely responsible for
16 it, and I apologize.

17 Mr. Kohnen, do you have your sword available for me
18 to fall upon or are you willing to waive that?

19 MR. KOHNEN: I'm sorry, Your Honor. I didn't hear
20 you?

21 THE COURT: If you'd approach. I apologize for
22 being 20 minutes late. It's on me and me alone. I ask
23 whether you had your sword and wish me to fall upon it or if
24 you would waive that?

25 MR. KOHNEN: I will waive that, Your Honor. Thank

1 you.

2 THE COURT: Very well. Are we ready for the Jury
3 from the Government's perspective?

4 MR. MANGAN: Yes, Your Honor.

5 THE COURT: Are we ready from the Defense's
6 perspective.

7 MR. McBRIDE: We are ready, Your Honor.

8 THE COURT: Let's call for the Jurors.

9 COURTROOM DEPUTY: All rise for the Jury.
10 (Jury entered the Courtroom.)

11 THE COURT: You may all be seated. The 15 Jurors
12 have joined us in the courtroom. To the Jurors, good
13 morning.

14 You were delayed by me this morning for 20 or
15 25 minutes. It's on me and me alone. It doesn't relate to
16 this case. Please accept my apology.

17 We are prepared to proceed with the testimony of
18 this witness. We're going today basically in 30-minute
19 chunks, and then break for 15 minutes to accommodate all
20 persons and the process.

21 Mr. Mangan, you may proceed. The witness
22 understands he's still under oath; correct?

23 THE WITNESS: I do.

24 THE COURT: Very well. You may proceed, Mr.
25 Mangan.

CONTINUED DIRECT EXAMINATION

BY MR. MANGAN:

Q Good morning, Agent Hull.

A Good morning.

Q If you recall yesterday we were talking about exchanges; do you remember that?

A I do.

Q All right. In the context of exchanges, did you see calendar references in the Cloud to those meetings?

A Yes.

Q And did those references also refer to dinners or banquets with guests?

A Often.

Q And with respect to those banquets, did you ever see the term Eighth Division applied techniques?

A Yes.

Q And did you ever see chats or messages between Mr. Xu and others around the same time as those dinners?

A Yes.

Q And did those chats seem to make reference to the copying of digital media or laptops?

A They did.

Q I'll ask you to take a look at Exhibit 44a and b?

THE COURT: We'll show those to the witness.

(Government's Exhibits 44a through 44e marked.)

1 (Government's Exhibits 44a through 44e shown on the screen
2 for the Court and Witness.)

3 **BY MR. MANGAN:**

4 **Q** Actually if you can look through 44a through 44e so
5 that we can describe what those are.

6 **A** (Witness reviews exhibits.) Okay.

7 **Q** Can you describe what those are, sir?

8 **A** 44b, c, d, and e are UFED Extraction Reports from the
9 Apple iPhone backup that we discussed previously containing
10 SMS text messages in Mandarin Chinese with an English
11 translation in the back.

12 And 44a is a compilation of text messages, iCalendar
13 references that we compiled together.

14 **Q** And these references in the 44 exhibits, do they
15 pertain to particular meetings with a guest?

16 **A** Yes.

17 **Q** What's the name of the guest?

18 **A** Li Jing, L-I. Second name J-I-N-G.

19 MR. MANGAN: Your Honor, we'd move to admit
20 Exhibit 44a through e?

21 MR. McBRIDE: No objection, Your Honor.

22 THE COURT: They're admitted.

23 (Government's Exhibits 44a through 44e admitted.)

24 MR. MANGAN: May we produce -- or excuse me. May
25 we publish 44a?

1 THE COURT: Yes.

2 (Government's Exhibit 44a was shown on the screen for Jury.)

3 **BY MR. MANGAN:**

4 **Q** Now, Agent Hull, you mentioned this also includes
5 information from the calendar?

6 **A** It does.

7 **Q** And in what color are the calendar entries?

8 **A** Gray.

9 **Q** Okay. And the entries in blue, what are those?

10 **A** The messages from the Defendant, Xu Yanjun.

11 **Q** And then if the messages are in a different color, are
12 those messages to the Defendant?

13 **A** Yes.

14 **Q** All right. Let's start with the calendar entries.
15 Actually let's start with the first day. If you could read
16 the two calendar entries at the top, please?

17 **A** "April the 20th, 2014. Afternoon, picked up Li from
18 train station and checked in Jinling Hotel."
19 "4/20/2014, Evening, Zha held banquet for Li at
20 Yanboyugang. The Eighth applied techniques. The
21 laptop was not turned off, therefore, could only work
22 on hard drive."

23 **Q** Okay. If we could turn to the next day, that's
24 April 21, 2014; is that correct?

25 **A** I do.

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1 **Q** Are there a series of messages between Mr. Xu and
2 another person?

3 **A** Yes.

4 **Q** All right. Could we go ahead and start reading those
5 messages? If you read Mr. Xu, I will read the responses.

6 **A** "I will contact the group to inform Director-General
7 Liang."

8 **Q** "We got the notice here. Okay. It will be late when
9 you arrive at the hotel. You can eat at the
10 restaurant in the hotel. We will meet at the third
11 conference room at 9 a.m. tomorrow?"

12 **A** "Sorry for troubling you guys this time."

13 **Q** "Please don't say that, haha."

14 And then if we could stop there. I'd like to move
15 down to the message, the next message from Mr. Xu that
16 starts with, "Department Head Liang." Can you go ahead and
17 read those two messages -- or that message, please?

18 **A** "Department Head Liang, we are bringing the guest to
19 the seminar in the institute tomorrow. Our contact is
20 Tao, Xiaojiang." That's T-A-O. Second name,
21 X-I-A-O-J-I-N-G.

22 "To protect the guest, Tao did not enter it in the
23 logbook. This is for your information."

24 **Q** All right. And then for the two calendar logs that
25 are below that in gray for April 21, 2014, does that say,

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11

1 "Noon, with Zha, held banquet for Li at Yongfuyan?"

2 **A** It does.

3 **Q** And then the second one, does that say, "Afternoon,
4 flew to Xi'an with Li, stayed in Runtian?"

5 **A** It does.

6 **Q** All right. Now, let's turn to April 22. Is there a
7 message from Mr. Xu to Tao again?

8 **A** Yes.

9 **Q** Could you read the message?

10 **A** "Director Tao, two things to remind you for today's
11 exchange. 1, the expert does not know my true
12 identity, I approached him with the name under Jiangsu
13 State Science and Technology Association; 2, do not
14 mention the materials."

15 **Q** All right. And then are there a few calendar
16 entries?

17 **A** Yes.

18 **Q** Okay. If we could read the very last one at the
19 bottom for the afternoon?

20 **A** "Afternoon, I returned to Nanjing. Li returned to
21 Hangzhou."

22 **Q** Thank you.

23 MR. MANGAN: If we could turn the page, page two?
24 (Government's Exhibit 44a page two was shown on the screen
25 for Jury.)

1 **BY MR. MANGAN:**

2 **Q** For April 27, are there two messages from Xu Yanjun to
3 Li Jiang?

4 **A** Yes.

5 **Q** And is that the guest we were talking about
6 previously?

7 **A** It is.

8 **Q** All right. Could you read those two messages?

9 **A** "Dr. Li, you will go back to the United Kingdom the
10 day after tomorrow. I would like to confirm with you
11 the following: The high-lift system will still be the
12 focus of the September lecture. The high-lift system
13 is our next collaborating project. For reference
14 materials."

15 "For reference materials, the focus is still the e-2
16 repair manual and the f-35 ammo bay. Thanks."

17 **Q** Agent Hull, do you know what the f-35 is?

18 **A** I do.

19 **Q** What is that?

20 **A** It's a fighter aircraft built by the U.S. Military.

21 **Q** All right. And do you recall what company Mr. Jiang
22 worked for?

23 **A** I don't at this time, no.

24 **Q** All right. Was he from the United Kingdom?

25 **A** He was.

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13

1 **Q** All right. Was there another meeting with Li Jiang in
2 December of 2014?

3 **A** Yes, there was.

4 **Q** All right. If you could read the calendar entries for
5 December 7, 2014?

6 **A** "Li Jiang came to Nanjing. Received."

7 "Afternoon, picked up Li from South Station."

8 "Evening, Zha held banquet. Eighth Division applied
9 techniques."

10 **Q** All right. And then after that, did you find a series
11 of messages between Mr. Xu and Zha Rong during that same
12 time on December 7?

13 **A** Yes.

14 **Q** And again, who is holding the banquet for Mr. Li?

15 **A** Zha.

16 **Q** All right. If we could read through those messages?
17 You can read the messages from Mr. Xu, and I'll read the
18 responses from Zha Rong.

19 **A** "Just picked up the guest, on the way to the hotel."

20 **Q** "Okay."

21 **A** "I will be there any minute!"

22 **Q** "I am in the private room, and the dishes have been
23 ordered?"

24 **A** "Waiting on the laptop computer. There are one
25 portable hard drive and two small drives."

1 Q "Okay."

2 "There is no need for Little Geng to come."

3 A "Okay."

4 "Copying the entire thing needs three hours."

5 Q "It's too slow. Speed it up."

6 "If it doesn't work, use your own computer to copy
7 it?"

8 A "Now, the 2014 document folder is being copied.
9 Basically, we have the rest. The 2014 one needs
10 40 minutes."

11 MR. MANGAN: If we could turn to next page?
12 (Government's Exhibit 44a page three was shown on the screen
13 for Jury.)

14 THE WITNESS: "The copying of this materials will
15 most likely be done from 15 minutes. Restoring the
16 scene and documents will take roughly 20 minutes."

17 "Document copying has been completed, and restoring
18 is in -- is in progress now."

19 "Restored, and we have left the scene."

20 **BY MR. MANGAN:**

21 Q All right. If you could stop there. Are there
22 additional messages and exchanges related to Mr. Li?

23 A Yes.

24 Q All right.

25 MR. MANGAN: If we could turn one more page?

1 (Government's Exhibit 44a page three was shown on the screen
2 for Jury.)

3 **BY MR. MANGAN:**

4 **Q** Do you see a communication on April 2, 2015, from Mr.
5 Xu to Mr. Li that starts with, "Dr. Li --

6 **A** Yes.

7 **Q** -- we'll meet you?"

8 **A** Sorry. I do.

9 **Q** All right. If you could read those three blue
10 messages, please?

11 **A** "Dr. Li, we will meet you at the exit of the Lon Xiang
12 Qiao subway station."

13 "May I trouble you to bring the computer. I would
14 like to take a look at the, quotation, AS,
15 unquotation, serial documents."

16 "I am at the Hangzhou East Station now and will arrive
17 at the Lon Xiang Qiao Station around 2 o'clock."

18 **Q** All right. Thank you. Agent Hull, did you also find
19 references to the Eighth Division applying techniques for
20 another guest?

21 **A** Yes.

22 **Q** Do you recall a guest named Yin Junfei.

23 **A** I do.

24 **Q** That's spelled Y-I-N-J-U-N-F-E-I?

25 **A** Yes.

1 Q All right.

2 MR. MANGAN: I'd ask that you ask the witness to
3 look at Exhibits 45a through c?

4 (Government's Exhibits 45a through 45c marked.)

5 THE COURT: Very well.

6 THE WITNESS: (Witness reviews exhibits.)

7 (Government's Exhibits 45a, 45b and 45c shown on the screen
8 for the Court and Witness.)

9 **BY MR. MANGAN:**

10 Q And can you explain what those are?

11 A 45c is a UFED Extraction Report of the Apple backup
12 for the iPhone 5s with 12 SMS messages in Mandarin Chinese
13 with an English translation in the back.

14 B are the specific text messages compiled, and then A
15 is a compilation of iCalendar data as well as selected text
16 messages from that chain.

17 Q And does that pertain to Yin Junfei?

18 A It does.

19 MR. MANGAN: Your Honor, we'd move to admit
20 Exhibits 45a through c?

21 MR. McBRIDE: No objection, Your Honor.

22 THE COURT: Admitted.

23 (Government's Exhibits 45a through 45c admitted.)

24 MR. MANGAN: May we publish 45a?

25 THE COURT: Yes. Ms. Frankian, if you would

1 approach?

2 (The Court confers with Ms. Frankian.)

3 THE COURT: Thank you for that interruption. Go
4 ahead.

5 MR. MANGAN: If we could move down to the bottom,
6 please?

7 **BY MR. MANGAN:**

8 **Q** Could you read the -- I'm looking at the April 30,
9 2014, calendar entry. Do you see where it says:

10 "Afternoon, accompanied Yin Junfei to tour Laomendong.
11 Evening, held banquet at Yongfuyuan. Zha attended.
12 During this period of time, the Eighth Division
13 applied technique."

14 Do you see that?

15 **A** I do.

16 **Q** All right. And did you also find messages during that
17 same time?

18 **A** Yes.

19 **Q** All right. If you could read the message from Xu
20 Yanjun on April 30, 2014. Who is that message to?

21 **A** Chen Li.

22 **Q** And, again, who is Chen Li?

23 **A** He's the Division Director.

24 **Q** Can you read that?

25 **A** "Division Director Chen, the guest has it turned off."

1 Q And then later on, about an hour half later, is there
2 message from Chen Li to Xu Yanjun?

3 A Yes.

4 Q And what does he say?

5 A "Taken care of?" Question mark.

6 Q All right. Thank you.

7 MR. MANGAN: We can take that down.

8 **BY MR. MANGAN:**

9 Q Agent Hull, recall yesterday we were talking about an
10 organization called JAST; do you remember that?

11 A I do.

12 Q And remind us what that stands for?

13 A The Jiangsu Association for Science and Technology.

14 Q Did you find other examples within the Defendant's
15 communications that refer to JAST?

16 A Yes.

17 MR. MANGAN: Could you have the witness take a look
18 at exhibits -- excuse me, 46d?

19 THE COURT: 46d?

20 (Government's Exhibit 46d marked.)

21 (Government's Exhibit 46d shown on the screen for the Court
22 and Witness.)

23 THE WITNESS: (Witness reviews exhibit.)

24 **BY MR. MANGAN:**

25 Q Do you recognize what that is?

1 **A** I do.

2 **Q** What is it?

3 **A** It's a UFED Extraction Report with two SMS text
4 messages from the Apple iPhone 5s from the Defendant's
5 texts.

6 **Q** And is the translation highlighted in yellow?

7 **A** It is.

8 MR. MANGAN: Your Honor, we'd move to admit 46d?

9 MR. McBRIDE: No objection.

10 THE COURT: It's admitted.

11 (Government's Exhibit 46d admitted.)

12 MR. MANGAN: May we publish?

13 THE COURT: Yes.

14 (Government's Exhibit 46d was shown on the screen for Jury.)

15 **BY MR. MANGAN:**

16 **Q** Agent Hull --

17 MR. MANGAN: If we could look at the message at the
18 bottom?

19 **BY MR. MANGAN:**

20 **Q** What is the date of this message being sent?

21 **A** 8-21-2014.

22 **Q** All right. Can you read the message that's
23 highlighted in yellow?

24 **A** "Teacher Zhang, my working identity is Qu Hui, the
25 Deputy Secretary General of Jiangsu Province Foreign

1 Science and Technology Association. Thanks, Xu
2 Yanjun."

3 Q All right. Thank you.

4 MR. MANGAN: If we could take that down? I'd ask
5 that the witness look at Exhibits 47a and b?

6 (Government's Exhibits 47a and 47b marked.)

7 (Government's Exhibit 47a and 47b shown on the screen for
8 the Court and Witness.)

9 THE WITNESS: (Witness reviews exhibits.)

10 **BY MR. MANGAN:**

11 Q And can you describe what that is?

12 A 47a is an E-Mail from amoy_y@yahoo.com to
13 jastquhui@gmail.com dated 9-18 of 2013. 47a is the Mandarin
14 with an English response, and 47b is the English translation
15 of the same.

16 MR. MANGAN: Your Honor, we'd moved to admit 47a
17 and b?

18 MR. McBRIDE: No objection.

19 THE COURT: Admitted.

20 (Government's Exhibits 47a and 47b admitted.)

21 MR. MANGAN: If we could publish the English
22 version?

23 THE COURT: Yes.

24 (Government's Exhibit 47b was shown on the screen for Jury.)

25 MR. MANGAN: That is Exhibit 47b. We'd start at

1 the bottom, please? If we could see who the message is
2 from?

3 **BY MR. MANGAN:**

4 **Q** Who is this E-Mail from?

5 **A** jastquhui@gmail.com.

6 **Q** All right. And what is the subject?

7 **A** Jiangsu Provincial Association for International
8 Science and Technology Development - collaboration matters.

9 **Q** All right. And in the body of this, does Qu Hui
10 invite the person for a visit?

11 **A** Yes.

12 **Q** Okay. If you could take a look at the paragraph at
13 the bottom -- excuse me -- toward the bottom where it starts
14 with, "during the exchange." If you could read that
15 paragraph, please?

16 **A** "During the exchange with Dr. Zhan, Z-H-A-N, we
17 understand that members of your association are mainly
18 high-tech experts from China with sufficient
19 technology and human resources.
20 As for our association, we mainly provides services to
21 foreign high-tech experts in China, including
22 exchange, explore, and entrepreneurship, and promote
23 relevant personnel to establish collaborations with
24 Chinese enterprises to achieve bilateral success.
25 Therefore, the collaboration between two associations

1 can create high-potential impact."

2 **Q** Thank you. And looking back up at the first
3 paragraph, was this being sent to the President of the
4 Phoenix Branch of the American Society of Civil Engineers in
5 the U.S.?

6 **A** Yes.

7 **Q** All right. Thank you.

8 MR. MANGAN: I'd like you to take a look at
9 Exhibit 48a and b and identify those for the Jury?
10 (Government's Exhibits 48a and 48b marked.)

11 THE WITNESS: (Witness reviews exhibits.)

12 THE COURT: As he looks at the exhibit, may I?

13 MR. MANGAN: If we could display 48a and b?
14 (Government's Exhibit 48a shown on the screen for the Court
15 and Witness.)

16 THE COURT: To the witness and the Court. You're
17 using paper exhibits, and I'm now seeing them on the screen.
18 Thank you. You may proceed.

19 THE WITNESS: (Witness reviews exhibit.) 48a is an
20 E-Mail from jastxyj@gmail.com in Mandarin Chinese with an
21 attachment which is a doc.

22 **BY MR. MANGAN:**

23 **Q** And what is 48b?

24 MR. MANGAN: If we could show that to the witness?
25 (Government's Exhibit 48b shown on the screen for the Court

1 and Witness.)

2 THE WITNESS: 48b is the English translation of the
3 same E-Mail as well as the attachment.

4 MR. MANGAN: Your Honor, we'd move to admit 48a and
5 b?

6 MR. McBRIDE: No objection.

7 THE COURT: Admitted.

8 (Government's Exhibits 48a and 48b admitted.)

9 MR. MANGAN: May we publish 48b?

10 THE COURT: Yes.

11 (Government's Exhibit 48b was shown on the screen for Jury.)

12 MR. MANGAN: If we could start at the bottom?

13 **BY MR. MANGAN:**

14 **Q** Agent Hull, what is the date of this E-Mail?

15 **A** 5-8-2014.

16 **Q** And what is the E-Mail address it's from?

17 **A** jastxyj@gmail.com.

18 **Q** All right. And it's addressed to a Professor Zhang.

19 Can you read the message to Professor Zhang?

20 **A** "Professor Zhang, how are you? Attached is the job
21 posting at our organization. Also, please do not
22 reveal our security agency background when you notify
23 the students and only mention the posting under the
24 name of Jiangsu Science Promotion Association. Thank
25 you."

1 Q All right. And then what is the name of the
2 attachment?

3 A Job posting at Jiangsu Foreign Science and Technology
4 Promotion Association dot doc.

5 Q Thank you.

6 MR. MANGAN: If we could turn to next page?
7 (Government's Exhibit 48b page two was shown on the screen
8 for Jury.)

9 **BY MR. MANGAN:**

10 Q Was the attachment the job posting translated as well?

11 A Yes.

12 MR. MANGAN: And if we can scan down to the bottom,
13 toward the end of the job posting?

14 **BY MR. MANGAN:**

15 Q At the bottom it has some contact information, does it
16 not?

17 A It does.

18 Q All right. And it states that "interested parties
19 please submit resume to jastxyj@gmail.com."

20 Do you see that?

21 A I do.

22 Q And then what is the contact information listed below
23 that?

24 A "Contact person: Xu Yanjun, the Defendant.

25 Telephone: 13913882316. E-Mail: jastxyj@gmail.com.

1 Company website: HTTP:\\www.stachina.org."

2 **Q** Do you recognize that telephone number?

3 **A** I do.

4 **Q** From what?

5 **A** It was the phone that was collected when the Defendant
6 was arrested in Brussels, Belgium and associates back to the
7 iCloud account as previously testified.

8 **Q** Do you recall mention of a business card that was
9 found?

10 **A** Yes. The GE Aviation engineer's house in Ohio.

11 **Q** Did it have the same phone number?

12 **A** It did.

13 **Q** There's a company website there, stachina.org, is that
14 an -- excuse me. Is that a website that the F.B.I. can
15 view on the Internet?

16 **A** Yes.

17 **Q** And did you view that?

18 **A** Yes.

19 **Q** All right. And were you able to take screenshots of
20 the website?

21 **A** We were.

22 **Q** Were you able to look at prior versions of the screen
23 site -- prior versions of the website?

24 **A** Yes.

25 **Q** And how did you do that?

1 **A** We used something called Web Archive.

2 **Q** And can you explain what that is?

3 **A** It's a service where they basically go and take screen
4 captures of websites across the Internet, and they're --
5 they are archived over time, so the program goes out and
6 basically crawls the Internet, and you can go and look at a
7 website at a particular time period, and we did that on a
8 couple of occasions.

9 **Q** Did the F.B.I. take screenshots of this website at
10 different time periods?

11 **A** We did.

12 **Q** All right. And was that done at your direction?

13 **A** It was.

14 MR. MANGAN: I'd ask the witness to be able to view
15 Exhibits 49a and 49b?

16 (Government's Exhibits 49a and 49b marked.)

17 THE COURT: Yes.

18 (Government's Exhibit 49a and 49b shown on the screen for
19 the Court and Witness.)

20 THE WITNESS: (Witness reviews exhibits.)

21 **BY MR. MANGAN:**

22 **Q** All right. When you're ready, can you explain what
23 those are?

24 **A** 49a page one is a screen capture of the stachina.org
25 website; and 49a page two is a English translation of the

1 same.

2 And then 49b is another version of the same website,
3 with the English translation on the second page.

4 **Q** All right. Thank you.

5 MR. MANGAN: Your Honor, we'd move to admit 49a and
6 b?

7 MR. McBRIDE: Your Honor, I have an objection.
8 Lack of foundation. This gentleman did not -- according to
9 his testimony -- get these screenshots himself. He can't
10 determine or tell whether or not they're fair and accurate
11 representations of the screenshots --

12 THE COURT: All right. All right. I'm not here to
13 have a lot of talk. The objection's sustained. Will you
14 lay a foundation?

15 **BY MR. MANGAN:**

16 **Q** Agent Hull, did you actually view the website
17 yourself?

18 **A** I did, but I don't read Mandarin Chinese, so I
19 requested a linguist to look at it.

20 **Q** But as far as the original version --

21 **A** Yes.

22 **Q** -- were you involved in the actual screenshots that
23 were taken?

24 **A** These ones, no; but originally I did look at them,
25 yes.

1 **Q** Okay. And did you look at the Internet archived
2 version as well?

3 **A** Yes.

4 MR. MANGAN: Your Honor, may we submit them again?

5 THE COURT: You may proceed. Foundation's been
6 laid.

7 (Government's Exhibits 49a and 49b admitted.)

8 MR. MANGAN: May we publish 49a?

9 THE COURT: Yes.

10 MR. McBRIDE: No objection, Your Honor.

11 THE COURT: Very well.

12 (Government's Exhibit 49a was shown on the screen for Jury.)

13 **BY MR. MANGAN:**

14 **Q** For 49a, first of all, Agent Hull, what was the date?
15 It's hard to see. I know it's in yellow at the top. Do you
16 see that?

17 **A** I do.

18 **Q** And what does that date represent?

19 **A** That the screen capture from the web archive was
20 collected on May 22 of 2013.

21 **Q** Okay. And does it have the, the actual web address
22 available to the left there?

23 **A** It does.

24 **Q** All right. Thank you. And then was this translated?

25 **A** It was on page two.

1 MR. MANGAN: If we could turn to page two?
2 (Government's Exhibit 49a page two was shown on the screen
3 for Jury.)

4 **BY MR. MANGAN:**

5 **Q** All right. So if we look at the translation from
6 May 22, 2013?

7 MR. MANGAN: If we can scan down, please?
8 (Government's Exhibit 49a page two was shown on the screen
9 for Jury.)

10 MR. MANGAN: A little further, please? Thank you.
11 (Government's Exhibit 49a page two was shown on the screen
12 for Jury.)

13 **BY MR. MANGAN:**

14 **Q** Under the Standing Directors for the organization, do
15 you see that, sir?

16 **A** I do.

17 **Q** And who is the very last -- what is the last name
18 listed under the Standing Directors?

19 **A** Qu Hui.

20 **Q** All right. And is that the alias that we've been
21 discussing?

22 **A** It is.

23 **Q** And what is the name right before that?

24 **A** Cai Ming.

25 **Q** Do you recognize that name?

1 **A** I do.

2 **Q** What is?

3 **A** That is the alias name of Chai Meng.

4 **Q** Who we've been discussing as well?

5 **A** Yes.

6 **Q** And, again, the date for this was in 2013?

7 **A** It was.

8 **Q** All right.

9 MR. MANGAN: We'd like to publish 49b, if we could?

10 THE COURT: It's been admitted so, yes.

11 MR. MANGAN: All right. Thank you.

12 (Government's Exhibit 49b was shown on the screen for Jury.)

13 MR. MANGAN: If we could turn to page two for the
14 translation?

15 (Government's Exhibit 49b page two was shown on the screen
16 for Jury.)

17 **BY MR. MANGAN:**

18 **Q** If we look at the date at the top, what was the date
19 for this screen capture?

20 **A** June the 21st of 2018.

21 MR. MANGAN: And if we could scan down?

22 (Government's Exhibit 49b page two was shown on the screen
23 for Jury.)

24 **BY MR. MANGAN:**

25 **Q** Was the date of this screen capture, was this after

1 the arrest of the Defendant?

2 **A** Yes, it was.

3 **Q** And did you notice any names being removed from the
4 website?

5 **A** The Qu Hui name is no longer present.

6 **Q** All right. Thank you.

7 MR. MANGAN: We can take those down.

8 THE COURT: I'd like to take a break now if that
9 works?

10 MR. MANGAN: Yes, sir.

11 THE COURT: All right. I told you we were going to
12 do this in 30-minute chunks. We're going to break for
13 15 minutes.

14 During the break, do not discuss the case among
15 yourselves or with anyone else. No independent research.
16 Continue to keep an open mind. We'll rise as you leave.

17 COURTROOM DEPUTY: All rise for the Jury.

18 (Jury exited the Courtroom.)

19 THE COURT: Jury's left the room, and the door is
20 closed. We're in recess for 15 minutes. See you at that
21 time. Witness should not discuss his testimony. We are now
22 in recess.

23 COURTROOM DEPUTY: This Court is now in recess.

24 (Court was in recess at 10:20 a.m. and resumed at 10:38
25 a.m.)

1 COURTROOM DEPUTY: All rise. This Court is in
2 session pursuant to the recess.

3 THE COURT: Thank you. Please be seated.
4 Government's team here. Defense team's here. The
5 Defendant.

6 Are we ready to proceed from the Government's
7 perspective?

8 MR. MANGAN: We are, Your Honor.

9 THE COURT: The Defense as well?

10 MR. McBRIDE: Yes, Your Honor.

11 THE COURT: We'll call for the Jurors.

12 COURTROOM DEPUTY: All rise for the Jury.

13 (Jury entered the Courtroom.)

14 THE COURT: You all may all be seated. The 15
15 Jurors have rejoined us. Welcome back. We're going to
16 proceed. The witness is under oath. Mr. Mangan, you may
17 proceed.

18 MR. MANGAN: Thank you, Your Honor.

19 THE COURT: We're going to do this in 30-minute
20 chunks as I told you. Go ahead.

21 **BY MR. MANGAN:**

22 **Q** Agent Hull, referring back to earlier in your
23 testimony you talked about Visa records you received from
24 France; do you recall that?

25 **A** I do.

1 Q And during that did you see -- did you discuss
2 information relating to a trip in 2017 by the Defendant?

3 A Yes.

4 Q Can you explain what you knew about that?

5 A The Defendant and a group of other individuals
6 traveled from China, and they went to a number of countries
7 within the European Union.

8 Q All right. And regarding -- when was that trip in
9 2017?

10 A June.

11 Q All right. And was there an event going on in France
12 at the time?

13 A Yes. The Paris Air Show.

14 Q Can you explain what the Paris Air Show is?

15 A So Paris Air Show is one of three major air shows in
16 the world. The other being Fairford in the United Kingdom
17 and Dubai in the United Air Emirates where most major
18 aircraft manufacturers or component manufacturers attend.
19 The Paris Air Show they have what they call chalets --

20 THE COURT: I'm going to ask you to slow down.
21 Thank you.

22 THE WITNESS: They have chalets where they sort of
23 show the wares that they have there for sale commercially to
24 members of the aviation public and industries.

25 BY MR. MANGAN:

1 **Q** And who generally attends these shows?

2 **A** All the big aircraft manufacturers, but the public can
3 go as well but only for certain days.

4 **Q** All right.

5 MR. MANGAN: I'd ask if we can publish Exhibit 11h,
6 which I believe is already admitted?

7 THE COURT: Yes.

8 (Government's Exhibit 11h was shown on the screen for Jury.)

9 MR. MANGAN: If we could turn to page nine?

10 (Government's Exhibit 11h page nine was shown on the screen
11 for Jury.)

12 **BY MR. MANGAN:**

13 **Q** Agent Hull, are these -- is this part of the records
14 you received from France for the Visa applications?

15 **A** It is.

16 **Q** All right. And looking at page nine, can you describe
17 what this is?

18 **A** (Witness reviews exhibit.) One moment, please. This
19 is a proposed itinerary for a ten-day tour in Europe.

20 **Q** And for the itinerary that was submitted to the French
21 authorities, does it mention the French Air Show?

22 **A** It does not.

23 **Q** All right.

24 MR. MANGAN: And if we could turn a couple pages
25 back in the documentation to page 11?

1 (Government's Exhibit 11h page 11 was shown on the screen
2 for Jury.)

3 **BY MR. MANGAN:**

4 **Q** I think we looked at another document earlier where it
5 says listed -- where the Defendant listed his employer for
6 this Schengen Visa; do you recall that?

7 **A** I do.

8 **Q** And what was the name of the company that he listed?

9 **A** Nanjing Luote Technology Information Center.

10 **Q** And in looking at page 11 of the Exhibit 11h; do you
11 see that there?

12 **A** I do.

13 **Q** All right. And can you read what it says there at the
14 top?

15 **A** "Dear Officer, herewith we confirm that Mr. Xu Yanjun
16 belongs to Nanjing Luote Technology Information
17 Center. His working period is 12 years. We approve
18 his trip to European countries during his holiday from
19 17 June 2017 to 26 June 2017. All costs and
20 accommodation will be paid by himself. His
21 information is as below. Name: Xu Yanjun. Passport:
22 G54460434. Date of birth: 20 September 1980.
23 Position: Marketing manager. Salary: 10,200 RMB."

24 **Q** All right. Agent Hull, does the name and date of
25 birth match the Defendant?

1 **A** Yes, it does.

2 **Q** And earlier we talked about a Cadre Form that was
3 found in the Cloud account?

4 **A** We did.

5 **Q** For Xu Yanjun?

6 **A** Yes.

7 **Q** And according to that Cadre account, where had he been
8 working the 12 years before this?

9 **A** The Ministry of State Security.

10 **Q** All right. And, again, was this part of the record
11 that was submitted to the French authorities for his Visa?

12 **A** Yes, it was.

13 **Q** Now, did you find records in the iPhone 5s Cloud
14 backup relating to this trip to Paris?

15 **A** Yes, I did.

16 **Q** All right.

17 MR. MANGAN: We'd ask that you take a look at
18 Exhibits 56a and b?

19 THE COURT: Yes.

20 (Government's Exhibits 56a and 56b marked.)

21 (Government's Exhibits 56a and 56b shown on the screen for
22 the Court and Witness.)

23 THE WITNESS: (Witness reviews exhibit.) Okay.

24 **BY MR. MANGAN:**

25 **Q** Do you have that there?

1 **A** I do.

2 **Q** Can you describe what Exhibits 56a and b are?

3 **A** 56a is a document in Mandarin Chinese, and 56b is the
4 English translation of the same.

5 **Q** And where was this found?

6 **A** It was found in a document folder within the iPhone
7 backup from the Apple material for the iPhone 5s.

8 **Q** And does it relate to this trip in 2017?

9 **A** It does.

10 MR. MANGAN: Your Honor, we'd move to admit
11 Exhibit 56a and b?

12 MR. McBRIDE: No objection.

13 THE COURT: Admitted.

14 (Government's Exhibits 56a and 56b admitted.)

15 MR. MANGAN: May we publish 56b?

16 THE COURT: Yes.

17 (Government's Exhibit 56b was shown on the screen for Jury.)

18 MR. MANGAN: If we could take a look at this
19 document starting at the top?

20 **BY MR. MANGAN:**

21 **Q** Do you see that, Agent Hull?

22 **A** I do.

23 **Q** And for the individuals that are listed there, do you
24 notice the Defendant's name on the left?

25 **A** Yes.

1 **Q** And then moving across, what is listed as his
2 position?

3 **A** Department Manager.

4 **Q** And then does it -- two columns over does it list an
5 Annual Salary?

6 **A** It does.

7 **Q** And then a Date of Employment?

8 **A** 2005.

9 **Q** Okay. And then a Birthday and a Cell Phone number;
10 correct?

11 **A** Correct.

12 **Q** And then the person below him, do you recognize that
13 name?

14 **A** I do.

15 **Q** Who is that?

16 **A** That is the second individual that was arrested with
17 the Defendant in Brussels, Belgium on April 1st, 2018.

18 **Q** And what is listed as the position for Xu Heng?

19 **A** Office Staff.

20 **Q** And then it has similar information for him as well;
21 correct?

22 **A** It does.

23 **Q** Now, looking down below, do you see a section called
24 Company Information?

25 **A** I do.

1 **Q** And can you read that first paragraph?

2 **A** "Nanjing Luote Technology Information Center is
3 established in 2001. The company has been focusing in
4 the developmental field of aircraft flight simulation
5 equipment and software, and developed dozens of
6 various simulation software that are strictly used for
7 national key aircraft models.

8 The company has an Administrative Department --
9 parentheses, the Office of Finance and the Finance
10 Office, end parentheses -- the R&D Department, and
11 Marketing Departments. The company has 48 million in
12 annual business revenue and 32 employees."

13 **Q** Okay.

14 MR. MANGAN: And if we could move down that page --
15 actually if we could turn to the second page where it says
16 the Points of Contact?

17 (Government's Exhibit 56b page two was shown on the screen
18 for Jury.)

19 **BY MR. MANGAN:**

20 **Q** Who is the name listed at the top there?

21 **A** It was a continuation of the previous page. It says:
22 "Chinese Points of Contact, and Organization Point of
23 Contact," and then on the page you have now it says,
24 "Chai Meng."

25 **Q** And then it lists a phone number?

1 **A** It does.

2 **Q** Is that the Chai Meng that we've discussed previously?

3 **A** Yes, it is.

4 **Q** And below that is there also a Nanjing Luote Point of
5 Contact?

6 **A** Yes, it is.

7 **Q** With a name and phone number?

8 **A** Yes.

9 **Q** And what is the name?

10 **A** Tong, T-O-N-G, Tingting, T-I-N-G-T-I-N-G.

11 **Q** Did you look for that name and phone number in the
12 Cloud account or any of the phones that were recovered?

13 **A** Yes, I did.

14 **Q** Was it found?

15 **A** No.

16 **Q** All right. But did you find information regarding
17 Chai Meng?

18 **A** Yes.

19 **Q** And his connection to the MSS?

20 **A** Yes.

21 **Q** Thank you. Ask you to take a look --

22 MR. MANGAN: If we could show the witness
23 Exhibit 57?

24 (Government's Exhibit 57 marked.)

25 (Government's Exhibit 57 shown on the screen for the Court

1 and Witness.)

2 **BY MR. MANGAN:**

3 **Q** Do you recognize what this is?

4 **A** I do.

5 **Q** All right. Can you explain it for the Jury?

6 **A** It is a -- it's two receipts dated in 2017. The
7 originals are images -- which are page three and page
8 four -- with official stamp, and English translation are the
9 first two pages.

10 **Q** And where were the images found?

11 **A** They were found in the iCloud backup for the Apple
12 iPhone 5s.

13 MR. MANGAN: Your Honor, we'd move to admit
14 Exhibit 57?

15 MR. McBRIDE: No objection.

16 THE COURT: Admitted.

17 (Government's Exhibit 57 admitted.)

18 MR. MANGAN: If we can start with pages -- if we
19 could publish, Your Honor?

20 THE COURT: Yes.

21 MR. MANGAN: If we can start with pages three and
22 four?

23 (Government's Exhibit 57 page three and four was shown on
24 the screen for Jury.)

25 **BY MR. MANGAN:**

1 Q Are those the images that we're discussing?

2 A They are.

3 Q All right.

4 MR. MANGAN: And then if we could go back to page
5 two?

6 (Government's Exhibit 57 page two was shown on the screen
7 for Jury.)

8 MR. MANGAN: Thank you. Go back to page two and
9 look at that translation screen.

10 **BY MR. MANGAN:**

11 Q You said these were two receipts; correct?

12 A Correct.

13 Q For this receipt, what is the name of the payee
14 organization?

15 A Nanjing Luote Technology Information Center.

16 Q And what is the amount that is being dispersed?

17 A 500,000 Yuan.

18 Q And the reason for payment?

19 A Ten days trip to Greece, France and Italy. Six
20 persons. Front payment.

21 Q All right. Thank you.

22 MR. MANGAN: I'll have you take a look at
23 Exhibit 58 as well.

24 (Government's Exhibit 58 marked.)

25 (Government's Exhibit 58 shown on the screen for the Court

1 and Witness.)

2 THE COURT: Yes.

3 **BY MR. MANGAN:**

4 **Q** Can you identify what that is?

5 **A** I can.

6 **Q** Where was this found?

7 **A** These were found, again, in the iCloud account for the
8 Apple 5s.

9 **Q** And what are they?

10 **A** They are tickets to the Paris Air Show with an entry
11 date of June 23 of 2017.

12 MR. MANGAN: Your Honor, we'd move to admit 58?

13 THE COURT: Any objection?

14 MR. McBRIDE: No, Your Honor.

15 THE COURT: Admitted.

16 (Government's Exhibit 58 admitted.)

17 MR. MANGAN: And may we publish?

18 THE COURT: Yes.

19 (Government's Exhibit 58 was shown on the screen for Jury.)

20 **BY MR. MANGAN:**

21 **Q** Agent Hull, are these the Paris Air Show tickets that
22 you found in the Cloud account?

23 **A** Yes.

24 **Q** All right. And once, again, on the itinerary
25 submitted to the French authorities, did they mention the

1 Paris Air Show?

2 **A** They did not.

3 **Q** Lastly, within the Cloud account did you find any
4 chats relating to this trip?

5 **A** Yes.

6 **Q** Were they extensive?

7 **A** Extensive.

8 **Q** All right.

9 MR. MANGAN: Can you take a look at Exhibits 59a
10 through 59d as in dog?

11 (Government's Exhibits 59a through 59d marked.)

12 THE COURT: Show them to him.

13 (Government's Exhibit 59a through 59d shown on the screen
14 for the Court and Witness.)

15 THE WITNESS: (Witness reviews exhibits.)

16 **BY MR. MANGAN:**

17 **Q** Can you explain what these are?

18 **A** Yes. 59c and d are UFED Extraction Reports for the
19 Apple iPhone 5s previously discussed with WeChats.

20 56b is another set of WeChats -- or excuse me -- 59b
21 is another set of WeChats, and 59a are excerpts of the
22 probably hundred pages of WeChats that we identified.

23 MR. MANGAN: Your Honor, we'd move to admit
24 Exhibits 59a through d?

25 MR. McBRIDE: No objection.

1 THE COURT: Admitted.

2 (Government's Exhibits 59a through 59d admitted.)

3 MR. MANGAN: If we could publish 59a, please?

4 THE COURT: Yes.

5 (Government's Exhibit 59a was shown on the screen for Jury.)

6 **BY MR. MANGAN:**

7 **Q** Agent Hull, we're just going to take a look at a
8 couple chats. You said this was sizable; correct?

9 **A** Yes.

10 **Q** All right. If we could first take a look at the
11 excerpts at the top there for WeChat number 63; do you see
12 that?

13 **A** I'm sorry. Could you repeat the last part?

14 **Q** For WeChat number 63 at the top?

15 **A** Yes.

16 **Q** All right. First of all, to the top left where it
17 says From, do you see the WeChat handle beneath that?

18 **A** I do.

19 **Q** And what does that handle end in?

20 **A** The name or the -- or the number?

21 **Q** Just the last five digits?

22 **A** Their alpha numeric?

23 **Q** Yes.

24 **A** It's sfg12.

25 **Q** And then what is the nickname?

1 **A** Youjan, Y-O-U-J-A-N.

2 **Q** All right. Is that another WeChat handle that you saw
3 in the Cloud account?

4 **A** Yes, it is.

5 **Q** And was that associated with the Defendant as well?

6 **A** Yes.

7 **Q** In looking at this, if we could take a look at the
8 second -- or the first two messages from Youjan to the
9 group. The date is June 9, 2017; do you see that?

10 **A** I do.

11 **Q** And can you read those two messages?

12 **A** "In this group everyone used their real names."

13 "Xu Heng should really study tax refund on the
14 weekend @Tom."

15 **Q** All right. Now, it references everyone using their
16 real names. Were there other indications where in the chats
17 they used nicknames?

18 **A** Yes.

19 **Q** And what do you notice about the nickname Tom?

20 **A** It associates with the Youjan and Xu Heng text
21 message.

22 **Q** Okay. Did you see other names like Tom being used in
23 the chats?

24 **A** Yes.

25 **Q** What types of names were used as code names, if you

1 will?

2 **A** Anglicized names.

3 **Q** Such as?

4 **A** Jack, Sam, names like that.

5 **Q** Okay. And did you find the same use of those names
6 like Tom and Sam and Jack on the phones found in Belgium?

7 **A** Yes, we did.

8 **Q** All right. Thank you.

9 MR. MANGAN: We can take that down.

10 **BY MR. MANGAN:**

11 **Q** We've been talking about references to this Nanjing
12 Luote, and the items you found within the phones and the
13 iCloud; right?

14 Other than the two trips to France, did you find any
15 other references to Nanjing Luote in the Defendant's
16 documents?

17 **A** No, I did not.

18 **Q** Did you find a job resume listing him as being with
19 Nanjing Luote?

20 **A** No, I did not.

21 **Q** We saw a Cadre application. Did you see a Cadre Form
22 listing him as being part of Nanjing Luote?

23 **A** No.

24 **Q** I think we went through pay stubs. What were the pay
25 stubs from?

1 **A** The Sixth Division.

2 **Q** Did you find any pay stubs relating to Nanjing Luote?

3 **A** No.

4 **Q** Did you see any text messages where the Defendant said
5 I'm Xu Yanjun from Nanjing Luote?

6 **A** No.

7 **Q** Did you see any messages from him at all relating to
8 Nanjing Luote other than these trips to Europe?

9 **A** No.

10 **Q** Any WeChats to that effect?

11 **A** No.

12 **Q** Did you see any Nanjing Luote work documents?

13 **A** I did not.

14 **Q** Any kind of work product at all?

15 **A** No.

16 **Q** All right. Thank you. If we could -- I'm going to
17 ask you to take a look at some other exhibits to identify
18 them. This might require you grabbing a different binder
19 that might be behind you. If you can take a look at
20 Exhibit 93a and b?

21 (Government's Exhibits 93a and 93b marked.)

22 THE WITNESS: (Witness reviews exhibits.) Okay.

23 **BY MR. MANGAN:**

24 **Q** Can you identify what those are?

25 **A** 93a is an E-Mail from jastquhui@gmail.com through

1 E-Mail account charles.zhan -- Z-H-A-N -- @honeywell.com
2 dated 2-29 of 2016.

3 MR. MANGAN: Your Honor, we'd move to admit
4 Exhibits 93a and b?

5 THE COURT: May I see the exhibit?
6 (Government's Exhibits 93a and 93b shown on the screen for
7 the Court and Witness.)

8 THE COURT: Any objection?

9 MR. McBRIDE: No, Your Honor.

10 THE COURT: It's admitted.
11 (Government's Exhibits 93a and 93b admitted.)

12 MR. MANGAN: Thank you. We will not publish it at
13 this time, Your Honor.

14 THE COURT: Very well.

15 MR. MANGAN: Could you also take a look at
16 Exhibits 94a and b?

17 (Government's Exhibits 94a and 94b marked.)

18 (Government's Exhibit 94a and 94b shown on the screen for
19 the Court and Witness.)

20 THE WITNESS: (Witness reviews exhibit.)

21 **BY MR. MANGAN:**

22 **Q** Agent Hull, do you recall seeing interactions between
23 the Defendant and a individual named Linda Li?

24 **A** I do.

25 **Q** And what are Exhibits 94a and b?

1 **A** 94a and b are a series of E-Mails from the
2 jastxyj@gmail.com account to the xuyanjun1980@sohu.com
3 account amongst others with attachments, and 94b are the
4 English translations of the same.

5 MR. MANGAN: We'd move to admit 94a and B?

6 THE COURT: Any objection?

7 MR. McBRIDE: No, Your Honor.

8 THE COURT: Admitted.

9 (Government's Exhibits 94a and 94b admitted.)

10 **BY MR. MANGAN:**

11 **Q** And then, Agent Hull, were there also text messages
12 and WeChats relating to Linda Li?

13 **A** Yes.

14 MR. MANGAN: If you could take a look at
15 Exhibits 95a through d?

16 (Government's Exhibits 95a through 95d marked.)

17 THE WITNESS: (Witness reviews exhibit.)

18 **BY MR. MANGAN:**

19 **Q** And identify those for us?

20 **A** (Witness reviews exhibits.) Okay.

21 **Q** And can you describe what those are?

22 **A** 95d is a UFED Extraction Report containing 48 SMS text
23 messages in Mandarin Chinese from the aforementioned Apple
24 iPhone backup with English translations at the rear; and
25 then 95a, b, and c, are the English translations of the

1 same.

2 MR. MANGAN: Your Honor, we'd move to admit 95a
3 through 95d?

4 THE COURT: Any objection?

5 MR. McBRIDE: Your Honor, I can't see the documents
6 on my screen here.

7 THE COURT: I can't either.

8 MR. MANGAN: 95a, let's start with that.
9 (Government's Exhibit 95a shown on the screen for the Court
10 and Witness.)

11 MR. MANGAN: And this is 95b.
12 (Government's Exhibit 95b shown on the screen for the Court
13 and Witness.)

14 MR. MANGAN: And then if we could show 95c?
15 (Government's Exhibit 95c shown on the screen for the Court
16 and Witness.)

17 **BY MR. MANGAN:**

18 **Q** And then, Agent Hull, you described 95d as well, as
19 what?

20 **A** It's a UFED Extraction Report for the original of
21 those three previous exhibits.

22 THE COURT: You move for their admission?

23 MR. MANGAN: We do move for admission of 95a
24 through d?

25 THE COURT: Any objection?

1 MR. McBRIDE: No, Your Honor.

2 THE COURT: They're admitted.

3 MR. MANGAN: Thank you.

4 (Government's Exhibits 95a through 95d admitted.)

5 (Government's Exhibit 96a marked.)

6 **BY MR. MANGAN:**

7 **Q** And then if you could turn to --

8 MR. MANGAN: If we could show the witness
9 Exhibit 96? If we could show 96?

10 **BY MR. MANGAN:**

11 **Q** Do you have it, Agent Hull?

12 **A** I do.

13 **Q** While we're waiting for that to pop up, if you could
14 explain what 96 is?

15 **A** 96 is a summary of the communications related to Linda
16 Li.

17 **Q** All right.

18 MR. MANGAN: We are going to move to admit 96, Your
19 Honor. I realize you can't see it right now.

20 THE COURT: Oh, I can see it because my law clerk
21 pops it up in four seconds but Counsel can't.

22 MR. MANGAN: While we're waiting on that, may I ask
23 a few more questions of the witness?

24 THE COURT: Yes.

25 MR. MANGAN: Oh, we have 96.

1 (Government's Exhibit 96a shown on the screen for the Court
2 and Witness.)

3 MR. MANGAN: There we go. Your Honor, we'd move to
4 admit Exhibit 96a?

5 MR. McBRIDE: No objection.

6 THE COURT: Admitted.

7 (Government's Exhibit 96a admitted.)

8 MR. MANGAN: Thank you. And then if we could --
9 let me ask the witness.

10 **BY MR. MANGAN:**

11 **Q** Were you able to -- did you identify another name
12 that was possibly used by the Defendant called Zhang Hui?

13 **A** Yes.

14 **Q** And did you obtain records from LinkedIn related to
15 that name?

16 **A** Yes.

17 (Government's Exhibits 97a and 97b marked.)

18 **BY MR. MANGAN:**

19 **Q** Can you take a look at Exhibits 97a and b and describe
20 what those are?

21 MR. MANGAN: And if we could show them on the
22 screen, please?

23 (Government's Exhibit 97a and 97b shown on the screen for
24 the Court and Witness.)

25 THE WITNESS: 97a is the material provided in the

1 search warrant return from LinkedIn to include the front
2 page of the LinkedIn account for Zhang Hui. And 97b is the
3 English translation of the same.

4 MR. MANGAN: We'd move to admit Exhibits 97a and b?

5 MR. McBRIDE: No objection, Your Honor.

6 THE COURT: Admitted.

7 (Government's Exhibits 97a and 97b admitted.)

8 (Government's Exhibits 98a and 98b marked.)

9 **BY MR. MANGAN:**

10 **Q** And then, lastly, with respect to Linda Li, can you
11 take a look at Exhibits 98a and b, and describe what those
12 are?

13 (Government's Exhibits 98a and 98b shown on the screen for
14 the Court and Witness.)

15 THE WITNESS: 98a are E-Mails from LinkedIn to
16 someone with the name of Zhang Hui at jastxyj@gmail.com.

17 98a is the original Mandarin E-Mails, and 98b is
18 the English translations of the same.

19 MR. MANGAN: We'd move to admit 98a and b, Your
20 Honor?

21 MR. McBRIDE: No objection.

22 THE COURT: Admitted.

23 (Government's Exhibits 98a and 98b admitted.)

24 MR. MANGAN: All right. Thank you.

25 **BY MR. MANGAN:**

1 **Q** Agent Hull, if you could find the binder that has
2 Exhibits 107 through 111, please? Actually the binder you
3 have right there --

4 **A** Yeah, it does.

5 **Q** -- does it have -- okay. If you could look at
6 Exhibits 107a and 107b?

7 (Government's Exhibits 107a and 107b marked.)

8 (Government's Exhibits 107a and 107b shown on the screen for
9 the Court and Witness.)

10 **BY MR. MANGAN:**

11 **Q** Do you recognize -- we'll wait until you get there.

12 **A** I do.

13 **Q** Do you recognize what those are?

14 **A** 107b is a UFED Extraction Report of 164 SMS text
15 messages recovered from the iCloud account, the previously
16 discussed Apple iPhone 5s; and 107a is an English
17 translation of the same text messages.

18 MR. MANGAN: Your Honor, we'd move to admit 107a
19 and b?

20 MR. McBRIDE: No objection.

21 THE COURT: Admitted.

22 (Government's Exhibits 107a and 107b admitted.)

23 (Government's Exhibits 108a and 108b marked.)

24 (Government's Exhibits 108a and 108b shown on the screen for
25 the Court and Witness.)

1 BY MR. MANGAN:

2 Q Agent Hull, if you could turn then to Exhibit 108a and
3 108b?

4 A (Witness reviews exhibits.)

5 Q All right. Ask you to describe what those are?

6 A 108b is a UFED Extraction Report of 64 SMS text
7 messages from the aforementioned iCloud backup from Apple
8 for the iPhone 5s in Mandarin with a small version of the
9 English translation at the back.

10 And 108a is the English translation of the same.

11 MR. MANGAN: All right. Your Honor, we'd move to
12 admit 108a and b?

13 MR. McBRIDE: No objection.

14 THE COURT: Admitted.

15 (Government's Exhibits 108a and 108b admitted.)

16 (Government's Exhibits 109a through 109d marked.)

17 (Government's Exhibit 109a through 109d shown on the screen
18 for the Court and Witness.)

19 BY MR. MANGAN:

20 Q Agent Hull, if you could turn to 109a through 109d and
21 identify those?

22 A (Witness reviews exhibit.) Okay.

23 Q And can you explain what those are?

24 A 109c is a UFED Extraction Report of 34 SMS text
25 messages from the aforementioned Apple backup for the iPhone

1 5s in Mandarin with the English translations at the rear of
2 the packet.

3 109d is one iMessage chat from a UFED Extraction
4 Report for the aforementioned Apple backup for the iPhone
5 5s.

6 And 109a and b, are the English translations of the
7 same.

8 Q Thank you.

9 MR. MANGAN: Your Honor, we'd move to admit
10 Exhibits 109a through d?

11 MR. McBRIDE: No objection.

12 THE COURT: Admitted.

13 (Government's Exhibits 109a through 109d admitted.)

14 (Government's Exhibit 110 marked.)

15 **BY MR. MANGAN:**

16 Q And then if you could describe Exhibit 110 as well?

17 MR. MANGAN: If we could show that to the witness?

18 (Government's Exhibit 110 shown on the screen for the Court
19 and Witness.)

20 THE WITNESS: (Witness reviews exhibit.)

21 **BY MR. MANGAN:**

22 Q What is it?

23 A 110 are summary of communications related to the
24 Safran incident.

25 Q All right.

1 MR. MANGAN: Your Honor, we'd move to admit
2 Exhibit 110?

3 MR. McBRIDE: No objection.

4 THE COURT: Admitted.

5 (Government's Exhibit 110 admitted.)

6 (Government's Exhibit 111 marked.)

7 MR. MANGAN: Your Honor, we'd also move to admit
8 Exhibit 111 pursuant to a stipulation?

9 THE COURT: No objection?

10 MR. McBRIDE: No objection, Your Honor.

11 THE COURT: Admitted by stipulation.

12 (Government's Exhibit 111 admitted.)

13 (Government's Exhibits 86a through 86d marked.)

14 (Government's Exhibits 86a through 86d shown on the screen
15 for the Court and Witness.)

16 **BY MR. MANGAN:**

17 **Q** All right. Agent Hull, I've got two more like this.
18 If you could find Exhibits 86a through d?

19 **A** (Witness reviews exhibit.)

20 **Q** Agent Hull, do you recall finding a longer recording
21 within the 5s backup?

22 **A** I do.

23 **Q** And what was the date on that recording?

24 **A** October the 13th, of 2017.

25 **Q** And then was that recording then transcribed and

1 translated?

2 **A** It was. It was about four hours long.

3 **Q** All right. Can you identify Exhibits 86a through d?

4 **A** 86a is the holder for the digital copy of the audio
5 recording.

6 86b is the English translation of the entirety of the
7 audio recording.

8 86c is a compilation or a continuation of the same
9 audio recording.

10 **Q** And then were there phone calls toward the end of the
11 recording?

12 **A** Yes, and 86d is the, is the specific phone call at the
13 end of that same recording.

14 **Q** All right. And --

15 MR. MANGAN: Your Honor, we'd move to admit
16 Exhibits 86a through 86d?

17 MR. McBRIDE: No objection.

18 THE COURT: Admitted.

19 (Government's Exhibits 86a through 86d admitted.)

20 **BY MR. MANGAN:**

21 **Q** And then did they relate to a visit by an individual
22 by the name of Arthur Gao?

23 **A** It did.

24 **Q** And who did he work for?

25 **A** He worked for Honeywell.

1 **Q** All right. Did you find various chat messages related
2 to Mr. Gao?

3 **A** Yes.

4 **Q** And where were those found?

5 **A** Within the iPhone 5s backup from Apple.

6 **Q** Can you identify Exhibits 87a through 87d?

7 (Government's Exhibits 87a through 87d marked.)

8 (Government's Exhibit 87a through 87d shown on the screen
9 for the Court and Witness.)

10 THE WITNESS: (Witness reviews exhibit.) Okay.

11 **BY MR. MANGAN:**

12 **Q** And explain what those are?

13 **A** 87d is a UFED Extraction Report of one WeChat
14 conversation -- so it's multiple pages, but it's just
15 selected as one conversation -- collected from the iPhone 5s
16 backup from Apple.

17 And then 87a, b, and c, are subsets of communications
18 from that WeChat.

19 **Q** All right.

20 MR. MANGAN: Your Honor, we'd move to admit
21 Exhibits 87a through d?

22 MR. McBRIDE: No objection.

23 THE COURT: Admitted.

24 (Government's Exhibits 87a through 87d admitted.)

25 THE COURT: We need to pause. We've gone

SPECIAL AGENT BRADLEY HULL -- DIRECT

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1 30 minutes. We're going to take a break, members of the
2 Jury. 15 minute break.

3 During the break, take a break. No discussion of
4 the case among yourselves or with anyone else. No
5 independent research. Continue to keep an open mind.

6 We'll rise as you leave.

7 COURTROOM DEPUTY: All rise for the Jury.

8 (Jury exited the Courtroom.)

9 THE COURT: Jury's left the room. We're in recess
10 for 15 minutes.

11 COURTROOM DEPUTY: This Court is in recess.

12 (Court was in recess at 11:11 a.m. and resumed at 11:26
13 a.m.)

14 COURTROOM DEPUTY: All rise. This Court is in
15 session pursuant to the recess.

16 THE COURT: Please be seated. Thank you. We're
17 back in the courtroom. Are we ready for the Jury from the
18 Government's perspective?

19 MR. MANGAN: Yes, Your Honor.

20 THE COURT: The Defense?

21 MR. McBRIDE: Yes, Your Honor.

22 THE COURT: We call for the Jurors, please.

23 COURTROOM DEPUTY: All rise for the Jury.

24 (Jury entered the Courtroom.)

25 THE COURT: You may all be seated. The 15 Jurors

1 have rejoined us. Welcome. We're going to continue to hear
2 testimony. Witness remains under oath.

3 Mr. Mangan, you can proceed.

4 MR. MANGAN: Thank you, Your Honor.

5 **BY MR. MANGAN:**

6 **Q** Agent Hull, I'd like to talk a little bit about the GE
7 Aviation investigation, when it started. Can you explain
8 the nature of the investigation?

9 **A** There was an engineer at GE Aviation who traveled to
10 China in May and June of 2017, and --

11 **Q** And what was the name of that employee?

12 **A** Dr. David Zheng, Z-H-E-N-G.

13 **Q** And what was the date of his presentation in China?

14 **A** June 2, 2017.

15 **Q** As part of that investigation, did you approach GE
16 Aviation?

17 **A** Yes.

18 **Q** All right. And did you provide them with some
19 information?

20 **A** Yes.

21 **Q** And did they help in terms of providing additional
22 information for the F.B.I. regarding the trip?

23 **A** Pursuant to legal process, yes.

24 **Q** What types of information did they provide?

25 **A** We received a forensic image of Dr. Zheng's GE

1 Aviation owned laptop, as well as training records,
2 personnel records, things of that nature.

3 **Q** Did you learn -- did you have that laptop analyzed?

4 **A** Yes.

5 **Q** All right. And did you learn of any information that
6 was downloaded by the employee?

7 **A** Yes.

8 **Q** Can you explain what was found?

9 **A** In March of 2017, he downloaded 41,000 files onto an
10 external hard drive; and on May the 25th of 2017, he
11 transferred five files on the day that he traveled to
12 China.

13 **Q** What other types of information did you collect
14 regarding the GE employee during your investigation?

15 **A** We did E-Mail search warrants for identified E-Mail
16 accounts for Dr. Zheng. We conducted credit checks and
17 things of that nature, and ultimately we executed a search
18 warrant on his home, his cell phone, and his vehicle on
19 November the 1st of 2017.

20 MR. MANGAN: If we could identify or show the
21 witness Exhibit 35a?

22 THE COURT: Yes.

23 (Government's Exhibit 35a marked.)

24 (Government's Exhibit 35a shown on the screen for the Court
25 and Witness.)

1 **BY MR. MANGAN:**

2 **Q** You mentioned E-Mails related to the GE employee. Was
3 there an E-Mail related to a Hotmail or Microsoft address?

4 **A** Yes.

5 **Q** And if you can look through Exhibit 35a?

6 **A** (Witness reviews exhibit.)

7 **Q** Tell us if you recognize what this is?

8 **A** I do.

9 **Q** And what are these?

10 **A** These are business records from Microsoft for a
11 Hotmail E-Mail account.

12 **Q** And was that related to the GE employee?

13 **A** It was.

14 **Q** All right.

15 MR. MANGAN: Your Honor, we'd move to admit
16 Exhibits 35a?

17 MR. McBRIDE: No objection.

18 THE COURT: Admitted.

19 (Government's Exhibit 35a admitted.)

20 (Government's Exhibit 35b marked.)

21 (Government's Exhibit 35b shown on the screen for the Court
22 and Witness.)

23 **BY MR. MANGAN:**

24 **Q** And if you look at 35b. Was there also a Gmail
25 account for this --

1 **A** Yes, there was.

2 **Q** Okay. And what is 35b?

3 **A** 35b is the Google business records, information
4 related to that E-Mail account.

5 **Q** All right.

6 MR. MANGAN: Your Honor, we'd move to admit
7 Exhibit 35b as well?

8 MR. McBRIDE: No objection.

9 THE COURT: Admitted.

10 (Government's Exhibit 35b admitted.)

11 MR. MANGAN: Okay. Thank you. We can take those
12 down.

13 **BY MR. MANGAN:**

14 **Q** In terms of looking at his personal E-Mail accounts,
15 were you able to see some of the communications that led up
16 to his June 2017 trip?

17 **A** Yes.

18 **Q** All right. And did it help you identify what E-Mail
19 addresses were inviting him to come over?

20 **A** Yes.

21 **Q** All right. What was the name of the primary person
22 inviting him?

23 **A** Chen Feng, C-H-E-N, F-E-N-G.

24 **Q** And how do you know that name?

25 **A** There were E-Mails to and from.

1 **Q** Okay. And is Chen Feng affiliated with any
2 university?

3 **A** Yes.

4 **Q** What university?

5 **A** The Nanjing University of Aeronautics and Astronautics
6 in Nanjing, China.

7 **Q** Are you able -- in the F.B.I. or anyone, can you look
8 at the NUAA website?

9 **A** Yes.

10 **Q** And did you do so?

11 **A** I did.

12 **Q** Is Mr. Chen Feng listed there?

13 **A** He is.

14 **Q** Okay. Did you also see references to, to NUAA on the
15 Defendant's calendar that we've discussed?

16 **A** Yes, numerous ones.

17 **Q** All right. And did you look for any communications
18 between the Defendant and an individual named Chen Feng on
19 his 5s backup phone?

20 **A** Yes.

21 **Q** Did you find messages?

22 **A** I did.

23 **Q** Can you take a look at Exhibits 51a through 51c?
24 (Government's Exhibits 51a through 51c marked.)

25 MR. MANGAN: If we can show those to the witness,

1 please?

2 (Government's Exhibit 51a through 51c shown on the screen
3 for the Court and Witness.)

4 THE WITNESS: (Witness reviews exhibits.)

5 **BY MR. MANGAN:**

6 **Q** And when you're ready, if you could identify what
7 those are?

8 **A** 51c is a UFED Extraction Report of 28 SMS text
9 messages and the Apple backup for the associated iPhone 5s
10 in Mandarin with English translations in the rear of that
11 packet.

12 51a and 51b are subsets of two of those text chains.

13 **Q** All right.

14 MR. MANGAN: Your Honor, we'd move to admit
15 Exhibits 51a through c?

16 MR. McBRIDE: No objection.

17 THE COURT: Admitted.

18 (Government's Exhibits 51a through 51c admitted.)

19 MR. MANGAN: If we could publish Exhibit 51a?

20 THE COURT: Yes.

21 (Government's Exhibit 51a was shown on the screen for Jury.)

22 **BY MR. MANGAN:**

23 **Q** Now, who are these chat messages between?

24 **A** Between the Defendant, Xu Yanjun, and Chen Feng.

25 **Q** Excuse me. Are these text messages?

1 **A** They are text messages.

2 **Q** Okay. Thank you. And next to the number where it
3 says -- in green -- do you see how there's a name above
4 that?

5 **A** I do.

6 **Q** Was that name actually programmed in with the number?

7 **A** It was.

8 **Q** All right. And then the number to the right for the
9 Defendant, do you recognize that phone number?

10 **A** It is. It is the same one we discussed ending in
11 2316.

12 **Q** Thank you. I'd like to read just at the bottom of
13 page two, if we could start there?

14 (Government's Exhibit 51a page two was shown on the screen
15 for Jury.)

16 MR. MANGAN: Thank you.

17 **BY MR. MANGAN:**

18 **Q** Looking there at May 1, 2015, do you see a message
19 from Chen Feng stating:

20 "I've still not gotten in touch with the foreigner
21 don't be anxious, brother?"

22 **A** I see the message.

23 **Q** And what is the response from the Defendant?

24 **A** "It's okay, talk again tomorrow."

25 **Q** If we could continue, I'll read his part for Chen

1 Feng.

2 "He has agreed, will confirm the time and place in the
3 afternoon?"

4 MR. MANGAN: Turning to the next page.

5 (Government's Exhibit 51a page three was shown on the screen
6 for Jury.)

7 THE WITNESS: "Good. When we meet, just say there
8 is a short clip and needs him to dub."

9 **BY MR. MANGAN:**

10 **Q** "Peter 153-6507-0168, Bro, give him a call or message
11 Him to set up a time and location. He's at Jiangning
12 campus?"

13 **A** "Good, thanks."

14 **Q** "No need to be polite, it's best if you go over
15 looking for him as he doesn't have a car which makes
16 things inconvenient?"

17 **A** "No problem. He's conversant in simple Chinese,
18 right."

19 **Q** "He can handle a little more complicated, don't
20 worry?"

21 **A** "Thanks big brother."

22 "This afternoon a colleague using an advertising
23 company's alias of Zhang Liming -- parentheses, as a
24 friend of yours, end parentheses -- met with that
25 foreigner and things went smoothly. Thanks."

1 **Q** All right.

2 MR. MANGAN: If we turn to the next page. The
3 final page at the top.

4 (Government's Exhibit 51a page four was shown on the screen
5 for Jury.)

6 MR. MANGAN: Thank you.

7 **BY MR. MANGAN:**

8 **Q** Do you see the very last message? Does the Defendant
9 invite Mr. Chen Feng over for a card game?

10 **A** He did.

11 **Q** All right. Now, you indicated that there were
12 messages -- excuse me -- that the name Chen Feng was
13 related to the GE Aviation investigation. Explain how?

14 **A** The GE Aviation engineer received an E-Mail from the
15 jastxyj@gmail.com account using that name.

16 **Q** All right. I'm going to ask you, Agent Hull, to take
17 a look at 60a and 60b.

18 (Government's Exhibits 60a and 60b marked.)

19 MR. MANGAN: If we could show those to the witness,
20 please?

21 THE COURT: Yes.

22 (Government's Exhibits 60a and 60b shown on the screen for
23 the Court and Witness.)

24 **BY MR. MANGAN:**

25 **Q** Can you identify what those are, Agent Hull?

1 **A** 60a are the Mandarin Chinese E-Mails from an E-Mail
2 address jeremy@nuaa.edu.cn to the GE Aviation engineer. And
3 60b are English translations of the same.

4 MR. MANGAN: Your Honor, we'd move to admit 60a and
5 60b?

6 MR. McBRIDE: No objection.

7 THE COURT: Admitted.

8 (Government's Exhibits 60a and 60b admitted.)

9 MR. MANGAN: Your Honor, if we could publish?

10 THE COURT: Yes.

11 MR. MANGAN: All right. We'd like to turn to 60b.
12 (Government's Exhibit 60b was shown on the screen for Jury.)

13 **BY MR. MANGAN:**

14 **Q** By the way, Agent Hull, we see some redactions
15 related to names. If we see a redaction, who does that
16 refer to?

17 **A** The GE Aviation engineer, Dr. David Zheng.

18 **Q** All right. Thank you. So if we can take a look at
19 page one. I know it's tough to read. What is the date of
20 that first E-Mail?

21 **A** March the 2, 2017.

22 **Q** And is it signed at the bottom by the name -- or
23 excuse me. What is the E-Mail address that's used for
24 this?

25 **A** jeremy@nuaa.edu.cn.

1 **Q** All right. Could you go ahead and read that first
2 paragraph for us, please?

3 **A** "Hello. I'm sorry to bother you. I, Chen Feng, am in
4 charge of the International Cooperation and Exchange
5 Office at Nanjing University of Aeronautics and
6 Astronautics -- parentheses, NUAA, end parentheses.
7 I am mainly in charge of matters related to the
8 exchanges with NUAA's overseas alumni, friendly
9 universities, and well-known institutions and business
10 people to promote NUAA's international exchange and
11 cooperation and drive NUAA's development of academic
12 and scientific research."

13 **Q** All right. And turning to the second paragraph, does
14 the first sentence state?

15 "I've learned from your on-line resume that you have
16 accumulated a wealth of engineering experience in
17 well-known companies such as GE Aviation."

18 Do you see that?

19 **A** I do.

20 **Q** All right. And moving down toward the bottom of that
21 paragraph, do you see where it states:

22 "I would like to take this opportunity to cordially
23 invite you to come to NUAA for a visit and an
24 exchange."

25 Do you see that?

1 **A** I do.

2 **Q** If you could read the next two sentences?

3 **A** "There is no restriction on the format of the
4 exchange, and details can be agreed upon later. NUAA
5 can pay for the cost of your trip back to China for
6 the exchange. If you are interested, please feel free
7 to contact me. My business E-Mail is
8 Jeremy@nuaa.edu.cn. I look forward to your response."

9 **Q** All right.

10 MR. MANGAN: And if we could turn to the next page?
11 (Government's Exhibit 60b page two was shown on the screen
12 for Jury.)

13 **BY MR. MANGAN:**

14 **Q** Does it have contact information for Chen Feng?

15 **A** It does.

16 **Q** All right. And what is his title?

17 **A** He's the Deputy Director of the International
18 Cooperation and Exchange Office.

19 **Q** Okay. Thank you.

20 MR. MANGAN: If we could turn to page three,
21 please?

22 (Government's Exhibit 60b page three was shown on the screen
23 for Jury.)

24 **BY MR. MANGAN:**

25 **Q** I believe you said that first E-Mail was March 2,

1 2017. What is the date of this response here?

2 **A** March 13, 2017.

3 **Q** All right. And is this from the GE employee?

4 **A** It is.

5 **Q** All right. If you could read the paragraph starting
6 with thank you.

7 **A** "Thank you for your E-Mail. I have been working at GE
8 for over ten years. After graduating with a doctorate
9 in the U.S., I first worked for five years at GE's
10 research and development department, then in 2012, I
11 moved to GE Aviation and have been working there for
12 close to five years. Currently I mainly work on
13 design."

14 **Q** And the second paragraph -- I'll read it. You tell me
15 if it's correct.

16 "I plan to make a trip back to China at the end of May
17 to see my parents. My hometown is Chuzhou, and I will
18 pass by Nanjing. If time allows, I can visit NUAA.
19 Once my itinerary is finalized, I will confirm with
20 you. I'm wondering about the format of the exchange
21 you used in the past. Could you share that
22 information with me?"

23 Did I read that correctly?

24 **A** You did.

25 **Q** All right. And was that in response to the first

1 E-Mail we had read?

2 **A** It was.

3 **Q** All right. Thank you.

4 MR. MANGAN: If we could turn then to page five?

5 THE WITNESS: (Witness complies.)

6 (Government's Exhibit 60b page five was shown on the screen
7 for Jury.)

8 **BY MR. MANGAN:**

9 **Q** Is there another E-Mail in the chain from Chen Feng?

10 **A** Yes.

11 **Q** All right. If you could read his response?

12 **A** "How are you? First, I am very glad to receive your
13 reply. Thank you very much for your interest in
14 coming back to China to do exchange.

15 Our formats of exchange are diversified. They can be
16 either lectures or internal discussions. They can be
17 adjusted accordingly to your availability.

18 If you have finalized your itinerary, you can send me
19 a copy -- parentheses, picture, end parentheses -- of
20 your airline ticket and other itinerary information so
21 that I can discuss relevant matters with the finance
22 department. Thank you again, Chen Feng."

23 **Q** All right. And the date of that E-Mail?

24 **A** It is March the 20, 2017.

25 **Q** Thank you.

1 MR. MANGAN: If we can turn to the next E-mail that
2 you found?

3 (Government's Exhibit 60b page six was shown on the screen
4 for Jury.)

5 **BY MR. MANGAN:**

6 **Q** Is this other E-Mail from Chen Feng?

7 **A** Yes, it is.

8 **Q** And what's the date of this E-Mail?

9 **A** It is April the 18th of 2017.

10 **Q** So is this almost a month later?

11 **A** It is.

12 **Q** And was there any intervening response from the GE
13 employee?

14 **A** No, there was not.

15 **Q** All right. So picking up with this new E-Mail on
16 April 18, it states:

17 "I am sorry to bother you. You mentioned before that
18 you would be coming back to China at the end of May."
19 Did I read that correctly?

20 **A** You did.

21 **Q** All right. If you could continue on?

22 **A** "I am wondering if you have booked your airline
23 ticket. If you have made all the arrangements, could
24 you please spend a few minutes to send me your
25 itinerary so that I can make arrangements with the

1 finance department on relevant matters.

2 Meanwhile, you can send me your preliminary thinking
3 regarding the exchange you will be doing so that we
4 can coordinate and make arrangement together.

5 We look forward to seeing you at NUAA. Chen Feng."

6 **Q** All right.

7 MR. MANGAN: If we could turn the page?

8 (Government's Exhibit 60b page seven was shown on the screen
9 for Jury.)

10 **BY MR. MANGAN:**

11 **Q** Is there a response from the GE employee?

12 **A** There is.

13 **Q** And, again, Agent Hull, were you finding these E-Mails
14 well after this all happened?

15 **A** Yes.

16 **Q** All right. So at this point this is before you've at
17 all engaged with this GE employee?

18 **A** Yes.

19 **Q** All right. So May 1st, are we about a month from the
20 presentation?

21 **A** Approximately, yes.

22 **Q** All right. Let's read this E-Mail from the GE
23 Aviation employee to Chen Feng?

24 **A** "Mr. Chen, how are you? I am sorry I did not reply to
25 you sooner. My itinerary has just been finalized.

1 The attachment is a copy of my itinerary.
2 I will go back to my alma mater in Harbin first, and
3 then I will go back to my hometown in Anhui. I can
4 come to NUAA to do the exchange on June 1st or 2nd.
5 I'm wondering about your schedule and arrangements for
6 these two days.
7 Regarding the exchange, I don't know what format you
8 would like to use. You probably learned a few things
9 about my background from LinkedIn, could you please
10 provide some general information about previous
11 exchanges? Thank you!"

12 **Q** All right. Thank you.

13 MR. MANGAN: If we turn to the next page?
14 (Government's Exhibit 60b page eight was shown on the screen
15 for Jury.)

16 MR. MANGAN: This would be page eight.

17 **BY MR. MANGAN:**

18 **Q** There's an inquiry from the GE employee about a week
19 later asking Mr. Chen if he received his last E-Mail
20 regarding the itinerary; correct?

21 **A** Correct.

22 **Q** All right.

23 MR. MANGAN: If we can turn to next page, page
24 nine?

25 (Government's Exhibit 60b page nine was shown on the screen

1 for Jury.)

2 **BY MR. MANGAN:**

3 **Q** Is there a response from Chen Feng a day or so later?

4 **A** There is.

5 **Q** All right. And he says, "I'm sorry I didn't reply."

6 If you can start with "First?"

7 **A** "First, regarding the exchange, we would like to have
8 a copy of your detailed personal resume. I hope you
9 could send it to me when you get a chance.

10 Second, your expertise is in composite materials. Is
11 your work mainly in the design of pod and engine hood
12 or in the area of blades?

13 Regarding the context of the exchange, the university
14 would like to have you propose two to three of your
15 specialized research topics and send the information
16 to me. We will then give you feedback based on the
17 scientific research needs at the university. Chen
18 Feng."

19 **Q** All right.

20 MR. MANGAN: And then if we turn the page?

21 (Government's Exhibit 60b page ten was shown on the screen
22 for Jury.)

23 **BY MR. MANGAN:**

24 **Q** Is there another short E-Mail dated March -- excuse
25 me -- May 9, 2017, from Chen Feng?

1 **A** There is.

2 **Q** Saying "Based on your feedback, we will determine the
3 topic of your exchange around the 15th of the month."
4 Correct?

5 **A** Correct.

6 **Q** All right.

7 MR. MANGAN: Now, if we could turn to page 11?
8 (Government's Exhibit 60b page 11 was shown on the screen
9 for Jury.)

10 **BY MR. MANGAN:**

11 **Q** There is an E-Mail from the GE employee on May 9,
12 asking Mr. Chen:

13 "How are you? I'm wondering if you have received my
14 last E-Mail regarding my itinerary at the end of May.
15 Please let me know -- please let me so that we can
16 have a discussion about the exchange?"
17 And then do you see --

18 MR. MANGAN: If we could stay at the top?

19 **BY MR. MANGAN:**

20 **Q** If you could see the reply from Chen Feng?

21 **A** "There is no restriction on the format -- parentheses,
22 the format can be, either a seminar or a lecture for
23 about two or three hours."

24 **Q** All right. Thank you.

25 MR. MANGAN: Let's turn the page then to the next

1 E-Mail.

2 (Government's Exhibit 60b page 12 was shown on the screen
3 for Jury.)

4 **BY MR. MANGAN:**

5 **Q** Is that dated May 10, 2017?

6 **A** It is.

7 **Q** All right. And is this from Chen Feng?

8 **A** Yes.

9 **Q** Now, if you could start with the paragraph:

10 "I have already contacted"?

11 **A** "I have already contact the College of Energy and
12 Power Engineering here. They made a suggestion for
13 your presentation: "Application, Design, and
14 Manufacturing Techniques of Composite Materials in
15 Aircraft Engines."

16 In terms of the content, it is suggested that you talk
17 about the following:

18 One, latest development in the application of
19 Composite materials in aircraft engines.

20 Two, development of the design and analysis technique
21 and the manufacturing technology of the composite
22 structural materials for engines."

23 **Q** All right. Thank you. And then the letter goes on to
24 talk a little bit about logistics?

25 **A** The E-Mail, it does.

1 **Q** Yes. Thank you.

2 MR. MANGAN: Let's turn to page 13.

3 (Government's Exhibit 60b page 13 was shown on the screen
4 for Jury.)

5 **BY MR. MANGAN:**

6 **Q** Is there a response from the GE employee on May 15,
7 2017?

8 **A** Yes.

9 **Q** All right. And he talks a little bit about the timing
10 and itinerary. If we could go down to the paragraph
11 starting with "Regarding." If you could read that, please?

12 **A** "Regarding the presentation or seminar, I think both
13 subjects are good. However, I am required to sign a
14 technical agreement with the company that I work for
15 here. Therefore, a lot of the work that I have
16 conducted at the company could not be shared. I can
17 only participate in a seminar or give a general
18 presentation. Please inform me your specific
19 requirements."

20 **Q** All right. Agent Hull, based on your investigation,
21 was GE Aviation aware of any of this dialogue?

22 **A** No, they were not.

23 **Q** All right. In all of the E-Mails we've talked through
24 so far, have been between the GE employee's E-Mail address
25 and Chen Feng?

1 **A** They have been from the jeremy@nuaa.edu.cn E-Mail
2 account.

3 **Q** Okay. Thank you.

4 MR. MANGAN: Now, let's turn to page 14, if we
5 could?

6 THE WITNESS: (Witness reviews exhibit.)
7 (Government's Exhibit 60b page 14 was shown on the screen
8 for Jury.)

9 MR. MANGAN: Thank you.

10 **BY MR. MANGAN:**

11 **Q** What's the date of this E-Mail?

12 **A** May the 15th, of 2017.

13 **Q** And who is this E-Mail from?

14 **A** It's from the jastxyj@gmail.com account.

15 **Q** And is the first time this E-Mail account jumps in?

16 **A** Yes.

17 **Q** All right. And was this sent to the GE employee?

18 **A** It was.

19 **Q** Can you read what was written?

20 **A** "How are you? Did you receive the earlier E-Mails?
21 If so, please confirm the relevant matters. Thanks a
22 lot. Chen Feng."

23 MR. MANGAN: And if we turn to the next page?
24 (Government's Exhibit 60b page 15 was shown on the screen
25 for Jury.)

1 BY MR. MANGAN:

2 Q Was there a response from the GE employee?

3 A "I sent the E-Mails to your university E-Mail address.
4 Please confirm if you have received the E-Mails.
5 Thanks."

6 Q All right. And this reply went back to the jastxyj
7 E-Mail; correct?

8 A It did.

9 Q All right. If we continue on. Looking at page 16 --
10 or excuse me. Let's go to -- there's another E-Mail
11 dated --

12 MR. MANGAN: I'm sorry. Page 16, please? Sorry.
13 (Government's Exhibit 60b page 16 was shown on the screen
14 for Jury.)

15 BY MR. MANGAN:

16 Q There's another E-Mail, and is this from the Jeremy
17 E-Mail account?

18 A It is.

19 Q And dated May 16, 2017?

20 A Correct.

21 Q And this would be back to the GE employee again;
22 correct?

23 A Yes.

24 Q All right. And does this talk about the timing,
25 logistics for the meeting?

1 **A** It does.

2 **Q** All right.

3 **A** It acknowledges receipt of the E-Mail previously.

4 **Q** All right. Thank you. All right.

5 MR. MANGAN: Let's turn to the next page?

6 (Government's Exhibit 60b page 17 was shown on the screen
7 for Jury.)

8 **BY MR. MANGAN:**

9 **Q** Now, what's the date of this E-Mail?

10 **A** May the 17th of 2017.

11 **Q** Okay. Can you read this E-Mail from the GE employee:

12 **A** "Mr. Chen.

13 In addition to the exchange meeting that will last one
14 to two hours, do you have other arrangements --
15 arrangement? My trip back to China this time is
16 relatively short, and I need to go to several places
17 my schedule is rather tight. I hope you can
18 understand.

19 In addition, do you agree with what I wrote in my last
20 E-Mail regarding the content of the seminar."

21 **Q** All right.

22 MR. MANGAN: If we turn to the next page?

23 (Government's Exhibit 60b page 18 was shown on the screen
24 for Jury.)

25 **BY MR. MANGAN:**

1 **Q** Is there a reply from Chen Feng in the Jeremy account?

2 **A** Yes.

3 **Q** All right. And if you can read starting at the top?

4 **A** "How are you? Regarding the content of the exchange,
5 we fully respect your opinions, and will only discuss
6 general topics in the area of engine materials that
7 will not violate your company's technical agreement
8 requirements.

9 In addition, the College of Energy and Power
10 Engineering at our university attaches great
11 importance to your visit. The leaders of the college
12 have specially planned to host a welcoming dinner
13 party to express our gratitude and show our friendship
14 as hosts and our hope to establish long-term academic
15 cooperation relationship with you.

16 The leaders of the college have told me multiple times
17 that they hoped you could stay for a night in Nanjing
18 after the exchange. We can arrange the relevant
19 lodging for you.

20 In addition, the International Cooperation and
21 Exchange Office at NUAA can arrange a chartered
22 vehicle to take you from Chuzhou to Nanjing. What do
23 you think."

24 **Q** Okay. All right.

25 MR. MANGAN: And then if we could just turn to one

1 more E-Mail? This is dated May 20, 2017.

2 (Government's Exhibit 60b page 19 was shown on the screen
3 for Jury.)

4 **BY MR. MANGAN:**

5 **Q** And is this from the GE employee back to Chen -- back
6 to the Chen Feng at the Jeremy E-Mail?

7 **A** Yes.

8 **Q** Okay. And in this E-Mail, does he settle on a date
9 for the presentation?

10 **A** Yes.

11 **Q** All right. And then looking down at the second
12 paragraph, does he provide a title for his presentation?

13 **A** Yes.

14 **Q** What is that?

15 **A** "Development of the Design, Analysis, and
16 Manufacturing Technologies of Composite Structural
17 Material For Aircraft Engines."

18 **Q** And then going down to the final couple sentences, do
19 you see where it says:

20 "I am at your disposal for any activities besides the
21 presentation. Also, if there is anything else that I
22 need to prepare, please let me know. Thanks."

23 Do you see that?

24 **A** I do.

25 **Q** All right. And then I know you can see the rest of

1 60b. Are there a few additional E-Mails just regarding
2 logistics and pickups?

3 **A** Yes.

4 **Q** All right. Thank you. With respect to your
5 investigation, did you end up finding the actual slides for
6 Dr. Zheng's presentation?

7 **A** Yes.

8 **Q** All right. Was that something that he E-Mailed to
9 himself?

10 **A** He saved it in the draft folder of his personal E-Mail
11 account.

12 **Q** All right.

13 MR. MANGAN: If you can take a look at Exhibit 62?

14 (Government's Exhibit 62 marked.)

15 (Government's Exhibit 62 shown on the screen for the Court
16 and Witness.)

17 **BY MR. MANGAN:**

18 **Q** Can you identify what that is?

19 **A** (Witness reviews exhibit.) Yes, 62 is a draft message
20 from the GE Aviation engineer to himself with two
21 attachments. The first is entitled, PMC Applications Design
22 Analyst Analysis and Manufacturing pptx or a PowerPoint
23 file. And the second has the same name, but it's a PDF.

24 MR. MANGAN: All right. Your Honor, we'd move to
25 admit Exhibit 62?

1 MR. McBRIDE: No objection.

2 THE COURT: It is admitted.

3 (Government's Exhibit 62 admitted.)

4 MR. MANGAN: May we publish?

5 THE COURT: Yes.

6 (Government's Exhibit 62 was shown on the screen for Jury.)

7 **BY MR. MANGAN:**

8 **Q** If we can -- the first page is the E-Mail; correct?

9 **A** Yes.

10 MR. MANGAN: And if we turn to page two?

11 (Government's Exhibit 62 page two was shown on the screen
12 for Jury.)

13 **BY MR. MANGAN:**

14 **Q** Is this the first page of the attachment?

15 **A** It is.

16 **Q** And what is the -- obviously the title in English
17 that you can read?

18 **A** Application of Polymeric Matrix Composites, PMC, and
19 Aircraft Engine Structures, Analysis and Design.

20 **Q** And what is the date at the bottom?

21 **A** June 2, 2017.

22 **Q** All right. And then is there a stamp to the right?

23 **A** There is. It's a seal.

24 **Q** What does that seal say at the bottom?

25 **A** It's NUAA.

1 **Q** All right. Thank you. As part of your investigation,
2 did you end up doing a search warrant at the GE employee's
3 house?

4 **A** Yes.

5 **Q** Did you search his phone as well?

6 **A** Yes.

7 **Q** All right. And was that phone processed through
8 Cellebrite?

9 **A** It was.

10 **Q** In the same manner we've discussed with other phones?

11 **A** Yes.

12 **Q** All right. And were you able to review contents
13 through a UFED Reader?

14 **A** Yes.

15 **Q** Did you recover any WeChats related to this trip to
16 China?

17 **A** Yes.

18 **Q** All right. And who were those WeChats between?

19 **A** The GE Aviation engineer, the individual Chen Feng,
20 the alias name for the Defendant, Qu Hui, and I believe two
21 to three professors from NUA.

22 **Q** All right. Did you later confirm those contents with
23 the GE employee?

24 **A** Yes.

25 MR. MANGAN: I'll ask you to take a look at

1 Exhibit 64a and b?

2 (Government's Exhibits 64a and 64b marked.)

3 THE COURT: Before we get there, it's high noon.

4 Is this a good point to break?

5 MR. MANGAN: Sure, Your Honor.

6 THE COURT: Very well.

7 MR. MANGAN: Thank you.

8 THE COURT: It's high noon. You're going to have
9 some lunch. During the lunch break, take a break. No
10 independent research. Don't talk about the case among
11 yourselves or with anyone and enjoy the break. It's
12 12 o'clock. We'll come back looking for you at 1:15. We'll
13 recess until that time.

14 We'll rise as you leave.

15 COURTROOM DEPUTY: All rise for the Jury.

16 (Jury exited the Courtroom.)

17 THE COURT: Jury's left the room, and the door is
18 closed. Any of the lawyers have anything to interrupt my
19 lunch break from the Government's perspective?

20 MR. MANGAN: No, Your Honor.

21 THE COURT: From the Defense?

22 MR. McBRIDE: No, Your Honor.

23 THE COURT: We're in recess. Enjoy your lunch.

24 COURTROOM DEPUTY: All rise. This Court is now in
25 recess.

1 (Court was in recess at 12:00 p.m. and resumed at 1:21 p.m.)

2 COURTROOM DEPUTY: All rise. This Court is in
3 session pursuant to the recess.

4 THE COURT: Thank you. Please be seated. Are we
5 ready for the Jury from the Government's perspective?

6 MR. MANGAN: Yes, Your Honor.

7 THE COURT: The Defense?

8 MR. McBRIDE: Yes, sir.

9 THE COURT: If we could call for the Jury, please?

10 COURTROOM DEPUTY: All rise for the Jury.

11 (Jury entered the Courtroom.)

12 THE COURT: You may all be seated. 15 Jurors have
13 returned from the lunch break. It's Friday, informal
14 Friday, many of them are wearing jeans.

15 Are we ready to proceed from the Government's
16 perspective?

17 MR. MANGAN: Yes, Your Honor.

18 THE COURT: From the Defense?

19 MR. McBRIDE: Yes, sir.

20 THE COURT: You may proceed, Mr. Mangan. The
21 witness remains under oath.

22 **BY MR. MANGAN:**

23 **Q** Agent Hull, we were talking about some of the
24 communications and -- that you obtained related to the GE
25 employee; correct?

1 **A** Yes.

2 **Q** All right. And we talked about some WeChats that you
3 might have recovered from the GE employee's phone; do you
4 recall that?

5 **A** I do.

6 **Q** All right. If you could turn to Exhibit 64a and b?

7 **A** (Witness reviews exhibit.)

8 **Q** Once you find those, could you describe what they are
9 for the Jury, please?

10 **A** 64a is the English translation of WeChat messages from
11 the GE Aviation engineer's devices.

12 And 64b is the original Mandarin characters with the
13 English translation.

14 MR. MANGAN: Your Honor, we'd move to admit 64a and
15 b?

16 MR. McBRIDE: No objection.

17 THE COURT: Admitted.

18 (Government's Exhibits 64a and 64b admitted.)

19 MR. MANGAN: May we publish 64a?

20 THE COURT: Yes.

21 (Government's Exhibit 64a was shown on the screen for Jury.)

22 **BY MR. MANGAN:**

23 **Q** All right. Agent Hull, we'd like to go through a
24 couple of these chats here. Again, can you describe who the
25 chats are between?

1 **A** The green bubbles are the GE Aviation engineer, and
2 the gray bubbles are the account identified as Chen Feng.

3 **Q** All right. And if he could read, I'd like to read
4 page one onto page two. Would you like to read Chen Feng?

5 **A** That's fine.

6 **Q** And I will read the part for Employee 1. If you could
7 begin, what's the first date, please?

8 **A** May the 27th, 2017.

9 **Q** All right. Thank you.

10 **A** "Mr. Employee 1, this is my WeChat. Let's keep in
11 touch."

12 **Q** "Sure, what's your arrangement for the 2nd? What time
13 should I be there?"

14 **A** "Our side will pick you up in the morning of the 1st.

15 We will meet and chat in the morning of 2nd, then we
16 will have a lunch reception around the school. The
17 lecture and communication will begin at 14:30 in the
18 school and follows a dinner. You will then take the
19 high-speed rail back to Shanghai around 20:40."

20 "The schedule is a little tight. The hotel you are
21 staying is booked at Grand Metro Park Hotel for now.
22 There will be dinner receptions at a restaurant near
23 the school and at the school hotel. The communication
24 and exchange will be mainly with faculty and students
25 at -- parentheses, NUAA, end parentheses -- College of

1 Energy and Power Engineering, about one and a half to
2 two hours length."

3 **Q** "Mr. Chen, how about this, I can come to Nanjing from
4 Beijing in the morning of 6/2. I can be at the
5 Nanjing South Railway Station. We can stop by and
6 drop off the luggage at the hotel, and then head
7 straight to the school. We can do the lecture in the
8 afternoon, dinner in the evening, then I will head to
9 Shanghai from Nanjing in the early morning of June
10 3rd, to catch the flight at 12 p.m?"

11 "This way it will not delay your time in the morning
12 and have plenty of time in the afternoon?"

13 (Government's Exhibit 64a page two was shown on the screen
14 for Jury.)

15 **BY MR. MANGAN:**

16 **Q** If you could continue?

17 **A** "Mr. Employee 1, regarding to the fund used to cover
18 this travel, we applied for it from the -- unspecified
19 -- Province S&T Promotion Association. They are very
20 aware of your visit this time, and they want to meet
21 you in the morning of the 2nd. Therefore, I think you
22 should still arrive in the evening of the 1st
23 According to the original plan."

24 **Q** "Okay."

25 And then let's stop there. There are additional chats

1 regarding timing and logistics; correct?

2 **A** Yes.

3 MR. MANGAN: If we could proceed to page four?

4 (Government's Exhibit 64a page four was shown on the screen
5 for Jury.)

6 MR. MANGAN: If we go down midway?

7 **BY MR. MANGAN:**

8 **Q** See the chats that begin on June 2, 2017, at the
9 bottom half of page four. All right. And what was the date
10 of the presentation again?

11 **A** June the 2nd.

12 **Q** All right. We'll begin reading there. I'll read
13 Employee 1.

14 "I am on the high-speed rail to Shanghai. Thank you
15 for the introduction to the leaders at the S&T
16 Promotion Association and the professors at the NUAA!
17 Thank you for the arrangement on the schedule. The
18 academic communication is very successful. Let's keep
19 in touch. My personal E-Mail address is
20 Employee1@hotmail.com. I've also forwarded it to
21 Professor Zhang and Professor Hu?"

22 **A** "Got it. Thank you for the patience in the department
23 and the in-depth lecture. Welcome to have you
24 exchange again at NUAA. I have talked to Teacher Hu
25 regarding the PPT. I will forward your contact

1 information to them. Keep in touch."

2 MR. MANGAN: And if we go to next page?

3 (Government's Exhibit 64a page five was shown on the screen
4 for Jury.)

5 THE WITNESS: "Thank you for making it all the way
6 to NUAA to have this lecture. We welcome you and
7 your family to visit Nanjing next time."

8 **BY MR. MANGAN:**

9 Q "Hello Mr. Chen. What's the name of the lady we met
10 from the S&T Association?"

11 A "Ji Xiuming."

12 Q Could you spell that?

13 A J-I. Second name X-I-U-M-I-N-G.

14 "Do you need her contact information?"

15 Q "No needy. I'm going to write an appreciation letter
16 to Department Head Qu. Please greet her for me?"

17 "Is she the Director Ji?"

18 A "Yes. You remembered it."

19 Q Thank you. And we can set that exhibit to the side.
20 By the way we previously talked about calendar entries
21 related to this visit; do you recall that?

22 A I do.

23 Q And in the Defendant's calendar entries, did he talk
24 about meeting with another person named Ji?

25 A Yes, he did.

1 **Q** All right. Thank you. If you could turn to some
2 additional WeChats.

3 MR. MANGAN: If you could look at Exhibits 66a
4 through c. If we could present those to the witness?
5 (Government's Exhibits 66a through 66c marked.)

6 THE WITNESS: (Witness reviews exhibits.)
7 (Government's Exhibit 66a through 66c shown on the screen
8 for the Court and Witness.)

9 THE WITNESS: I am missing -- oh, I am missing --
10 oh, never mind. I saw it. I apologize. Yes. Okay. Now
11 I'm missing 66a.

12 MR. MANGAN: All right. If we could show it on the
13 screen to him? Do you have that in there?
14 (Government's Exhibit 66a shown on the screen for the Court
15 and Witness.)

16 THE WITNESS: I do not.

17 **BY MR. MANGAN:**

18 **Q** All right. If you can look at it on the screen. It's
19 only one page --

20 **A** Uh-huh.

21 **Q** -- fortunately, and then look at 66b and c --

22 **A** (Witness reviews exhibits.)

23 **Q** -- in order to describe what they are?

24 **A** 66c is a UFED Extraction Report for a WeChat
25 conversation in Mandarin Chinese to include the English

1 translation, which is contained in 66b; and then 66a is the
2 English translation.

3 THE COURT: Will you keep your voice up, please?

4 **BY MR. MANGAN:**

5 **Q** And where was this WeChat obtained?

6 **A** From the cellular telephone of the GE Aviation
7 engineer.

8 **Q** All right.

9 MR. MANGAN: Your Honor, we'd move to admit
10 Exhibit 66a through c?

11 MR. McBRIDE: No objection.

12 THE COURT: Admitted.

13 (Government's Exhibits 66a through 66c admitted.)

14 MR. MANGAN: Your Honor, if we could publish
15 Exhibit 66a?

16 THE COURT: Yes.

17 (Government's Exhibit 66a was shown on the screen for Jury.)

18 MR. MANGAN: Actually this -- I'm sorry. You can
19 take it down. We'll come back to read this later. No, I'm
20 sorry. Can we publish again? We're going to take care of
21 it now.

22 (Government's Exhibit 66a was shown on the screen for Jury.)

23 **BY MR. MANGAN:**

24 **Q** You already have it up. If you can read off the
25 screen, Agent Hull. Who are these chats between?

SPECIAL AGENT BRADLEY HULL -- DIRECT

100

1 **A** The green bubbles are the GE Aviation engineer, and
2 the gray bubbles are the WeChat account associated with Qu
3 Hui.

4 **Q** All right. If you could read the messages from Qu
5 Hui. First of all, the first message is dated June 12,
6 2017; correct?

7 **A** Yes.

8 **Q** All right. Go ahead.

9 **A** "Mr. Employee 1, this is Qu Hui."

10 **Q** "Hello, Department Head Qu."

11 **A** "Welcome to visit Nanjing again next year!"

12 **Q** "Thank you for your support on this exchange with
13 NUAA, and thank you for the gift. I will definitely
14 contact you again if I have a chance to visit China in
15 the future. I would love do academic share and
16 exchange with the faculties and students as long as it
17 does not involve any non-publicity information from
18 the company?"

19 "Say hello to Director Ji for me!"

20 **A** "Will do, Teacher Employee 1. I will also bring your
21 greeting to Director Ji."

22 **Q** All right. Thank you. Now, Agent Hull, at some point
23 did, did you confront the employee at GE?

24 **A** Yes.

25 **Q** Can you explain when that was?

1 **A** It was November 1st of 2017.

2 **Q** And was that an interview?

3 **A** It was.

4 **Q** Where was that conducted?

5 **A** In the visitor's center at GE Aviation on their campus
6 in Evendale, Ohio.

7 **Q** All right. And was the GE employee summonsed there by
8 GE officials?

9 **A** Yes.

10 **Q** All right. And during that interview, was he
11 permitted to leave?

12 **A** He was.

13 **Q** Was the GE employee placed under arrest at that time?

14 **A** He was not.

15 **Q** Okay. And around that same time, did you conduct the
16 search warrants that you described earlier?

17 **A** Yes.

18 **Q** And that included the search at his house?

19 **A** Correct.

20 **Q** And was that where you recovered the business card we
21 discussed?

22 **A** Yes.

23 **Q** All right. After the interview, did the GE employee
24 obtain an attorney?

25 **A** He did.

1 **Q** And did you seek his cooperation at that time?

2 **A** I did.

3 **Q** Did he agree to do so?

4 **A** Yes.

5 **Q** All right. Now, with the GE employee's cooperation,
6 what were the next steps in the investigation for you?

7 **A** We utilized the WeChat account of the aviation
8 employee, and we recontacted the Chen Feng account
9 indicating an interest for traveling back to the NUAA for
10 another presentation.

11 **Q** At this point were you still trying to investigate who
12 had, who had invited him over there?

13 **A** Yes.

14 **Q** All right. And did that include both Chen Feng and
15 the Qu Hui account?

16 **A** Yes.

17 **Q** All right. Now, how exactly did you re-establish
18 contact?

19 **A** Message was sent in late November of 2017 indicating a
20 desire to return for Chinese New Year, which is in late
21 January, early February of 2018 indicating an interest in
22 giving another presentation at NUAA.

23 **Q** As far as reinitiating contact and sending these
24 messages, what was your role in that process?

25 **A** I drafted the messages.

1 **Q** All right. Did you have control of actually typing in
2 the messages?

3 **A** No.

4 **Q** How was that done?

5 **A** The messages were translated into Mandarin characters,
6 which were then provided to the GE Aviation employee who
7 typed them into the cellular device into the WeChat App. I
8 then reviewed the content to make sure that they matched
9 what had been drafted, then they were sent.

10 **Q** All right. And were you able to keep track of what
11 was being sent and received on that phone?

12 **A** Yes.

13 **Q** And did you do the same thing with E-Mails?

14 **A** Yes.

15 **Q** Explain how that works?

16 **A** We would draft E-Mails, sometimes with attachments,
17 sometimes without, which were then translated by an F.B.I.
18 linguist in the Mandarin characters. I then supplied that
19 to the GE Aviation engineer through his Defense counsel.

20 They were then typed into the cellular telephone into
21 the E-Mail account. I would then confirm that the
22 characters were the same as those that we had approved; and
23 then if they were, the message would be sent.

24 **Q** For the WeChats and the E-Mails, were you able to take
25 screenshots of those messages?

1 **A** Yes.

2 **Q** All right. And were you able to document what was
3 sent and received?

4 **A** Yes.

5 (Government's Exhibits 67a through 67c marked.)

6 **BY MR. MANGAN:**

7 **Q** All right. Now, if you could take a look at
8 Exhibit 67a through 67c?

9 MR. MANGAN: I'd asked that those be shown to the
10 witness.

11 (Government's Exhibits 67a through 67c shown on the screen
12 for the Court and Witness.)

13 **BY MR. MANGAN:**

14 **Q** And can you describe what those are, Agent Hull?

15 **A** 67a are screen captures of the WeChat messages in the
16 original, in the Mandarin.

17 67b has both the English translation in there, and the
18 Mandarin characters next to one another.

19 And 67c is the English only characters.

20 **Q** All right. And then -- and are these the messages
21 that were sent back and forth on that WeChat handle to both
22 Chen Feng and Qu Hui?

23 **A** Yes.

24 MR. MANGAN: Your Honor, we'd move to admit
25 Exhibits 67a through 67c?

1 MR. McBRIDE: No objection, Your Honor.

2 THE COURT: Admitted.

3 (Government's Exhibits 67a through 67c admitted.)

4 MR. MANGAN: All right.

5 (Government's Exhibits 77a through 77c marked.)

6 **BY MR. MANGAN:**

7 **Q** I'd also ask you to take a look at Exhibit 77a through
8 c, which may be a different book.

9 MR. MANGAN: If we could present those to the
10 witness?

11 THE COURT: Yes.

12 (Government's Exhibits 77a through 77c shown on the screen
13 for the Court and Witness.)

14 THE WITNESS: (Witness reviews exhibits.) Okay.

15 **BY MR. MANGAN:**

16 **Q** And can you describe what 77a through c are?

17 **A** 77a are the original screenshots of messages sent on
18 the WeChat App in Mandarin between the GE Aviation engineer
19 and another WeChat account utilized by the Defendant.

20 **Q** At some point did the Defendant switch to a different
21 WeChat account?

22 **A** He did.

23 **Q** And that was when he was corresponding with the GE
24 employee?

25 **A** Yes.

1 **Q** All right. So these exhibits, do they pertain to
2 that -- the communications with that second account?

3 **A** They do. 77b has the original characters and English
4 translation, and 77c is just the English translation.

5 MR. MANGAN: Your Honor, we'd asked to admit
6 Exhibit 77a through c?

7 MR. McBRIDE: No objection.

8 THE COURT: Yes. Yes.

9 MR. MANGAN: Thank you.

10 (Government's Exhibits 77a through 77c admitted.)

11 **BY MR. MANGAN:**

12 **Q** And with all of these chats, Agent Hull, did this
13 continue with the same process in terms of your involvement
14 in writing the messages?

15 **A** It did.

16 **Q** Okay. We talked about changing the WeChat handles.
17 Before we kind of move on, if you can look at the screen.

18 MR. MANGAN: I'd like to show the witness
19 Exhibit 34?

20 (Government's Exhibit 34 marked.)

21 (Government's Exhibit 34 shown on the screen for the Court
22 and Witness.)

23 **BY MR. MANGAN:**

24 **Q** Were there multiple WeChat handles identified for this
25 Defendant?

1 **A** Yes.

2 **Q** And where were they identified?

3 **A** Various locations on the device itself, in the iPhone
4 5s backup, and in communications with the GE Aviation
5 engineer.

6 **Q** Okay. And did many of these WeChat handles also have
7 a picture or an icon with them?

8 **A** Yes. They each had a unique picture.

9 **Q** All right. Can you explain what Exhibit 34 is?

10 **A** 34 are the, the photo that was assigned -- or that
11 was created to go with each individual WeChat handle. The
12 first page is the, the Blue Bunny with the green leaf emoji
13 or character.

14 **Q** All right. And, again, are these all different WeChat
15 handles that were identified through either the phone seized
16 or the chats with the GE employee or the Cloud?

17 **A** Yes.

18 MR. MANGAN: Your Honor, we'd move to admit
19 Exhibit 34?

20 MR. McBRIDE: No objection, Your Honor.

21 THE COURT: Admitted.

22 (Government's Exhibit 34 admitted.)

23 MR. MANGAN: If we could publish?

24 THE COURT: Yes.

25 (Government's Exhibit 34 was shown on the screen for Jury.)

1 BY MR. MANGAN:

2 Q So just for the Jury's sake, looking at page one, is
3 this one of the WeChat handles?

4 A Yeah, we call it the Blue Bunny.

5 Q The Blue Bunny?

6 A Yeah.

7 Q All right. And next to it does that have the actual
8 WeChat account number?

9 A It does.

10 MR. MANGAN: If we could turn to page two?
11 (Government's Exhibit 34 page two was shown on the screen
12 for Jury.)

13 BY MR. MANGAN:

14 Q And what was the nickname for this account?

15 A Youjan, which translated into friendly gentleman.

16 Q And below that, is that the, the number for the
17 account?

18 A It is.

19 Q All right.

20 MR. MANGAN: And we turn to page three?
21 (Government's Exhibit 34 page three was shown on the screen
22 for Jury.)

23 BY MR. MANGAN:

24 Q What is this account?

25 A This is the handle that translated into Surface, also

1 Noodles, and we call this one the Big Red Face.

2 Q And this ends with numbers 55311?

3 A Yes, it does.

4 Q And I believe we talked about that account earlier?

5 A We did.

6 Q All right.

7 MR. MANGAN: And if we could turn to the next page?

8 (Government's Exhibit 34 page four was shown on the screen
9 for Jury.)

10 **BY MR. MANGAN:**

11 Q What was this account?

12 A This is the WeChat called Jerry. This was the account
13 that was utilized when communicating with the GE Aviation
14 engineer in Europe.

15 Q All right. Thank you. And is that the last page or
16 is there one more?

17 A That was it.

18 Q All right. Thank you. All right. Let's turn back to
19 the communications that you were doing with the GE employee.
20 You mentioned this also included E-Mails?

21 A It did.

22 (Government's Exhibits 68, 69, and 70 marked.)

23 **BY MR. MANGAN:**

24 Q If you can find the binding -- let's start with 68.

25 Do you see the Exhibit 68 and 69 and 70? I realize there's

1 a break in the binders.

2 **A** Yes. I have 68, 69 and 70 in this binder

3 (Indicating.)

4 **Q** All right.

5 (Government's Exhibit 68 shown on the screen for the Court
6 and Witness.)

7 **BY MR. MANGAN:**

8 **Q** Looking at those, are those some of the E-Mails that
9 were sent from the GE employee's E-Mail accounts?

10 **A** Yes, they are.

11 **Q** And were these sent in connection with the
12 communications that you controlled related to the
13 cooperation?

14 **A** Yes, they are.

15 **Q** And were they sent during the communication with the
16 person referring to themselves as Qu Hui?

17 **A** Yes.

18 **Q** All right.

19 MR. MANGAN: Your Honor, we'd move to admit
20 Exhibit 68, 69, and 70?

21 THE COURT: Any objection?

22 MR. McBRIDE: Your Honor, we did not see 69 and 70
23 on the screen.

24 THE COURT: Can we throw 69 up on the screen?

25 Thank you.

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1 (Government's Exhibit 69 shown on the screen for the Court
2 and Witness.)

3 MR. MANGAN: That's 69.

4 MR. McBRIDE: We have no objection, Your Honor.
5 Thank you.

6 THE COURT: Very well. They're admitted.

7 (Government's Exhibits 68, 69, and 70 admitted.)

8 **BY MR. MANGAN:**

9 **Q** Very good. I think, I think you're going to have to
10 switch binders.

11 MR. MANGAN: If we can go through 71 through 74?

12 (Government's Exhibits 71, 72, 73, and 74 marked.)

13 MR. MANGAN: If we could show Exhibit 71 on the
14 screen to the witness?

15 (Government's Exhibit 71 shown on the screen for the Court
16 and Witness.)

17 THE WITNESS: (Witness reviews exhibit.) (Witness
18 nods head affirmatively.)

19 **BY MR. MANGAN:**

20 **Q** What is Exhibit 71?

21 **A** 71 is the original E-Mail message from a web -- from
22 an E-Mail account provided in WeChat text from the GE
23 Aviation engineer in both English and with an English
24 translation. And 72 --

25 (Government's Exhibit 72 shown on the screen for the Court

1 and Witness.)

2 THE WITNESS: -- it's some of the same material.

3 It's just a different set of E-Mails, and then the same for
4 73, and 74.

5 (Government's Exhibit 73 shown on the screen for the Court
6 and Witness.)

7 **BY MR. MANGAN:**

8 **Q** Let's take them one at a time, so they can see. Shown
9 on the screen for you is Exhibit 73.

10 MR. MANGAN: And then if we could also show
11 Exhibit 74?

12 (Government's Exhibit 74 shown on the screen for the Court
13 and Witness.)

14 **BY MR. MANGAN:**

15 **Q** All right. Are these exhibits, Exhibit 71 through 74,
16 part of that same back and forth in the E-Mail chain that we
17 just discussed?

18 **A** Yes.

19 **Q** And these are E-Mails that you were involved in
20 writing and receiving?

21 **A** I drafted the original English.

22 **Q** For the E-Mails sent by the employee?

23 **A** Yes.

24 **Q** And the ones that were coming back, were coming back
25 from the individual as Qu Hui?

1 **A** Yes.

2 **Q** All right.

3 MR. MANGAN: Your Honor, we'd move to admit
4 Exhibit 71, 72, 73, and 74?

5 MR. McBRIDE: No objection.

6 THE COURT: Yes, yes, yes, yes.

7 MR. MANGAN: Thank you, Your Honor.

8 THE COURT: Very well.

9 (Government's Exhibits 71, 72, 73, and 74 admitted.)

10 MR. MANGAN: I have one more.

11 THE COURT: Very well.

12 (Government's Exhibit 76 marked.)

13 **BY MR. MANGAN:**

14 **Q** Could you take a look at Exhibit 76, please?

15 **A** (Witness reviews exhibit.) Okay.

16 (Government's Exhibit 76 shown on the screen for the Court
17 and Witness.)

18 **BY MR. MANGAN:**

19 **Q** Can you identify that?

20 **A** It's an E-Mail that was sent during the operation to
21 the, to the E-Mail account provided in the WeChat from the
22 GE Aviation engineer's account.

23 **Q** All right.

24 MR. MANGAN: And we'd move to admit Exhibit 76?

25 THE COURT: Any objection?

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1 MR. McBRIDE: No, Your Honor.

2 THE COURT: It's admitted.

3 (Government's Exhibit 76 admitted.)

4 **BY MR. MANGAN:**

5 **Q** All right. Agent Hull, at some point in these
6 communications through the GE employee, Dr. Zheng, did
7 you -- was a phone call arranged with this Qu Hui?

8 **A** Yes.

9 **Q** All right. And this is before the trip to Europe;
10 correct?

11 **A** Yes, at his request.

12 **Q** Do you recall the date?

13 **A** It was in, in March of 2018.

14 **Q** Or am I testing you?

15 **A** It was March of 2018. I can't give you the exact date
16 from memory.

17 **Q** And were you involved in that call?

18 **A** Yes.

19 **Q** Can you explain what was done?

20 **A** We utilized a device. We connected to the WeChat
21 application. We then placed a call within the WeChat
22 application to the Qu Hui handle.

23 A conversation was then recorded between the GE
24 Aviation engineer, and the person on the other side, which
25 we recorded with an audio device, which was then submitted

1 for translation and transcription.

2 Q All right. And were you also listening to it in
3 realtime?

4 A I was.

5 Q Were you sitting next to the GE employee as it
6 happened?

7 A Yes, in my car.

8 Q Okay.

9 (Government's Exhibits 75a and 75b marked.)

10 MR. MANGAN: If we could take a look at Exhibit 75a
11 and b?

12 BY MR. MANGAN:

13 Q Obviously, we do not have the audio recording in there
14 for you.

15 (Government's Exhibit 75b shown on the screen for the Court
16 and Witness.)

17 THE WITNESS: 75b is the English translation of the
18 audio file, which is the placeholder for 75a.

19 BY MR. MANGAN:

20 Q All right. And looking at the transcript, does it
21 indicate the date of the recording?

22 A It does. It was February the 28th, 2018.

23 Q Okay.

24 A Of course.

25 MR. MANGAN: Your Honor, we'd move to admit

1 Exhibit 75a and b?

2 MR. McBRIDE: No objection.

3 THE COURT: Admitted.

4 (Government's Exhibits 75a and 75b admitted.)

5 **BY MR. MANGAN:**

6 **Q** All right. Now, that we have these in, I'd like to
7 walk through all the communications that were done during
8 this period of cooperation; okay?

9 MR. MANGAN: If we could start with Exhibit 7 --
10 excuse me -- 67c.

11 We'd like to publish that, Your Honor.

12 THE COURT: Yes.

13 (Government's Exhibit 67c was shown on the screen for Jury.)

14 **BY MR. MANGAN:**

15 **Q** Okay. We're going to walk through these
16 communications. Does this begin with the communications
17 with Chen Feng?

18 **A** Yes, it does.

19 **Q** Okay. If we could read through those, if you could
20 read the part for -- first of all, who's talking on the
21 right?

22 **A** The green bubbles are the GE Aviation engineer's
23 account, and then the white bubbles in this instance are the
24 Chen Feng account.

25 **Q** All right. How about this time I will read the green

1 bubbles, and you can read the Chen Feng?

2 **A** (Witness nods head affirmatively.)

3 **Q** Is that okay?

4 **A** That's fine.

5 **Q** Okay. Starting on, is the first one on November 21?
6 2017?

7 **A** It is.

8 **Q** All right. "Hello Teacher Chen" -- well, I'm sorry.
9 You were the one writing the green bubbles; correct?

10 **A** Those are my words.

11 **Q** Why don't we have you read those since those are your
12 words anyway. Go ahead.

13 **A** "Hello Teacher Chen! It's been a while since our last
14 contact. Are you doing fine? Thanksgiving and
15 Christmas are approaching, and it's almost the end of
16 the year. I still much appreciate your warm reception
17 and arrangements a few months back in NUAA. Here I
18 wish you to have a smooth work and happy family."

19 **Q** "Thank you, Teacher. We greatly appreciate your
20 support to our school work. We would be glad to
21 welcome you to come to exchange and instruct again in
22 NUAA and meet up as old friends. Here I also wish
23 you, your family, and your child well and everything
24 goes smoothly in the foreign country?"

25 MR. MANGAN: We can turn to the next page.

1 (Government's Exhibit 67c page two was shown on the screen
2 for Jury.)

3 THE WITNESS: "Teacher Chen, thank you for your
4 greeting. The life in a foreign country is pretty
5 much it. After a big project I am working on comes
6 to the end of a phase, I am thinking about going
7 back to China in the New Year to see my parents
8 because they are getting old and not doing so well
9 in health. After all, every time I see them, it
10 means one fewer time to see them again. I feel
11 like I need to fulfill my filial piety. It will be
12 wonderful if the old friends can gather again by
13 then."

14 **BY MR. MANGAN:**

15 **Q** "Sure, Teacher, have you arranged your return date?
16 Let me know when it's solidified?"

17 And then there's a recall of a message. Can you --the
18 next message, "let's meet up by then?"

19 MR. MANGAN: Next page, please?

20 (Government's Exhibit 67 page three was shown on the screen
21 for Jury.)

22 THE WITNESS: "Hello Teacher Chen, I'm thinking
23 about going back in early February, probably a week
24 before New Year. But I know the plane tickets are
25 relatively expensive during that time so I haven't

1 pulled the trigger."

2 "The visitation to NUAA was very impressive, I
3 wonder if a similar arrangement is feasible."

4 **BY MR. MANGAN:**

5 **Q** "Hello teacher, the school is on break during the end
6 of the year and it is rather difficult to process the
7 financial matters. I discussed this with Mr. Qu from
8 the province science and technology association
9 several days ago. They will be in charge to work on
10 your China traveling expenses?"

11 MR. MANGAN: On the next page.

12 (Government's Exhibit 67c page four was shown on the screen
13 for Jury.)

14 **BY MR. MANGAN:**

15 **Q** Message dated January 5, 2018. "Happy New Year!
16 Teacher. Have you received the WeChat message? If
17 so, please let me know, and I will follow-up with up
18 Teacher Qu again?"

19 **A** "Teacher Chen, Happy New Year! I apologize for the
20 delay, I was overwhelmed by the work and holidays. I
21 will discuss the traveling expense matter with
22 Director Qu of S&T Association. Also, for the NUAA
23 trip this time, is there any particular material I
24 need to prepare."

25 **Q** "Hello Teacher, no worry. Your return trip this time

1 just happens to encounter school's off session. Most
2 teachers and students will be back to their hometown
3 that says, I have talked to Section Chief Qu, the
4 arrangement for your exchange this time will be
5 organized by Section Chief Qu. As for school, you
6 don't need to prepare any lecture material?"

7 MR. MANGAN: If we go to next page, and then it
8 picks up on January 11, 2018.

9 (Government's Exhibit 67c page five was shown on the screen
10 for Jury.)

11 THE WITNESS: "Hello Teacher Chen, I will contact
12 Section Chief Qu. I have messaged him my specific
13 schedule. Thank you and hope to see you again
14 soon!"

15 BY MR. MANGAN:

16 Q "Okay. Let's meet up again by then."

17 All right. We'll stop there for a moment. Was this
18 the end of the messages essentially between the GE employee
19 and Chen Feng?

20 A Yes.

21 Q All right. And at that point forward, were you
22 communicating with Qu Hui?

23 A Yes.

24 Q All right.

25 MR. MANGAN: If we could turn then to the next

1 page?

2 (Government's Exhibit 67c page six was shown on the screen
3 for Jury.)

4 **BY MR. MANGAN:**

5 **Q** Again, are the messages in green, are those the ones
6 through the account for the GE employee?

7 **A** Yes, they are.

8 **Q** And those are the ones you're preparing?

9 **A** Yes.

10 **Q** And then the messages in response with the icon in
11 white, is that the Blue Bunny for Qu Hui?

12 **A** It's the Blue Bunny.

13 **Q** All right. If we can start at the top there, sir. Go
14 ahead.

15 **A** "Hello Department Head Qu. This is -- blank -- from
16 GE in the America. It's been a while since our last
17 meet up. I have made plans to go back to China a week
18 before Chinese New Year. I have contacted Teacher
19 Chen several days ago, and if I'm visiting NUAA again,
20 I am wondering of this will still be arranged by him?
21 I hope I get to see you again by then!"

22 **Q** The response on January 21 -- excuse me --
23 December 21.

24 "It might not be too convenient to arrange because
25 NUAA is on break during that period of time. I can

1 try my best to arrange it for you on my end. You may
2 make a stop in Nanjing and we can have a chat?"

3 "Welcome back!"

4 "If you have already booked a ticket, please send it
5 to me as soon as possible?"

6 MR. MANGAN: Turning to the next page.

7 (Government's Exhibit 67c page seven was shown on the screen
8 for Jury.)

9 BY MR. MANGAN:

10 Q "Teacher, Merry Christmas." Then there is a call
11 canceled. If you could then go to January 8, and the
12 response that you wrote through the GE employee?

13 A "Director Qu, Merry Christmas and Happy New Year! I
14 Apologize for the delay. I was overwhelmed by work
15 and holidays. Thank you for arranging the S&T
16 Association to work on this. I will finalize my trip
17 soon and forward it to you.
18 Also, even though the school will be off session
19 during the Chinese New Year, is there any material you
20 would want me to prepare? Since this trip is arranged
21 by the Provincial S&T Association, it would be a great
22 honor for me to meet with the leaders from S&T
23 Association if possible."

24 MR. MANGAN: All right. If we turn to next page?

25 (Government's Exhibit 67c page eight was shown on the screen

1 for Jury.)

2 **BY MR. MANGAN:**

3 **Q** The response on January 9.

4 "I will touch base with the scientific research
5 department here to see what technology is desired, and
6 I will let you know what to prepare.

7 For your end, please prepare the plane ticket and date
8 as soon as possible. It's almost New Year Spring
9 Break and school will be empty. Many departments are
10 in holiday mode?"

11 And then message a little later.

12 "Please, teacher, please pay more attention to
13 WeChat?"

14 And then what is the next message?

15 **A** The text is on the following page, but this is an
16 image of a flychina.com ticket which we arranged in the, in
17 the GE Aviation employee's name to send to the Blue Bunny
18 account.

19 **Q** All right. Let's read the message that went with it
20 on the next page.

21 MR. MANGAN: Page nine.

22 (Government's Exhibit 67c page nine was shown on the screen
23 for Jury.)

24 THE WITNESS: "Hello Section Chief Qu, I am quite
25 busy in the beginning of the year. There are many

1 projects need undergo review and budget planning.

2 I will vigorously prepare my return trip. As
3 regarding the material, please let me know as soon
4 as possible so I can do some research and try my
5 best to meet the need for the exchange.

6 The following is my projected schedule for your
7 reference."

8 **BY MR. MANGAN:**

9 **Q** And that was the schedule that was in the picture?

10 **A** Correct.

11 **Q** The response, "Teacher, as for now, there's nothing
12 you need to prepare from my end?"

13 **A** "Hello Section Chief Qu, thank you for your reply.
14 I'm still very willing to contribute if any related
15 departments have any needs in the near future. Right
16 now, in my situation, it's convenient for me to gather
17 relevant information. It is also my desire to
18 maintain the good relationship between the Science and
19 Technology Association."

20 **Q** All right.

21 MR. MANGAN: And if we turn to the next page, the
22 next response is at the bottom?

23 (Government's Exhibit 67c page ten was shown on the screen
24 for Jury.)

25 **BY MR. MANGAN:**

1 Q "Teacher, after you land at Pudong, you may come to
2 Nanjing first and have a chat with us and then head
3 home?"

4 MR. MANGAN: And we can turn to page 11. The next
5 message is January 23, 2018.

6 (Government's Exhibit 67c page 11 was shown on the screen
7 for Jury.)

8 THE WITNESS: "Just recently I've heard the
9 speculation about laying off in my department. I,
10 of course, don't want to be affected, but the
11 possibility is there. That's why I am trying my
12 best to collect as much information as possible."

13 BY MR. MANGAN:

14 Q "Okay. Try your best to collect and we can talk by
15 then?"

16 "Domestically, there is more focused on the system
17 code?"

18 On January 25, 2018, "Mr. Employee 1. Our meet up can
19 be set to the 12th?"

20 MR. MANGAN: And then if we turn to the next page?
21 (Government's Exhibit 67c page 12 was shown on the screen
22 for Jury.)

23 THE WITNESS: "Hello Section Chief Qu, thank you
24 for the reply! Regarding the system code, can you
25 be more specific."

1 "Also, what is your E-Mail address? It's not too
2 convenient to send the documents through WeChat."

3 **BY MR. MANGAN:**

4 **Q** And just for a break here, Agent Hull, at this point
5 you're the one sending these messages; correct?

6 **A** I'm drafting them, yes.

7 **Q** And at this point you're trying to express, what?

8 **A** We're trying to understand exactly what the
9 requirements are.

10 **Q** All right. And so when he responds back,
11 "domestically, there is more focused on the system code",
12 were you seeking clarification of that?

13 **A** Yes.

14 **Q** All right. The response down here:
15 "System specification, design process?"
16 Then an E-Mail account, "qujast@163.com."
17 Agent Hull, do you know what 163.com is?

18 **A** I do.

19 **Q** What is it?

20 **A** It's an E-Mail service provider in China.

21 **Q** Okay.

22 **A** It's a free one like Yahoo.

23 **Q** Thank you.

24 MR. MANGAN: If we can turn to next page then?

25 (Government's Exhibit 67c page 13 was shown on the screen

1 for Jury.)

2 **BY MR. MANGAN:**

3 **Q** What's the next message you send?

4 **A** "Thank you Section Chief Qu! Since I will be sending
5 documents from my company computer, the Chinese 163
6 E-Mail address might be blocked. Do you have another
7 E-Mail address."

8 **Q** "It might be inappropriate to send directly from the
9 company; right?"

10 **A** "Well, do you have another E-Mail address? Just in
11 case."

12 **Q** The E-Mail is sent, "qujast2012@sina.com", S-I-N-A dot
13 com. And the last message?

14 **A** "I sent a document to your Sina E-Mail address.
15 Please check."

16 **Q** All right. And then the response at the very bottom?

17 MR. MANGAN: Further down, please?
18 (Government's Exhibit 67c page 14 was shown on the screen
19 for Jury.)

20 MR. MANGAN: Thank you.

21 **BY MR. MANGAN:**

22 **Q** "Okay."

23 "Teacher, I sent an E-Mail to you today. It was
24 rejected three times?"

25 All right. Did you find an E-Mail that was sent at

1 that point?

2 **A** Yes.

3 MR. MANGAN: If we could look at Exhibit 68 and
4 publish that? It's already been admitted, Your Honor.

5 THE COURT: Yes.

6 (Government's Exhibit 68 was shown on the screen for Jury.)

7 **BY MR. MANGAN:**

8 **Q** And taking a look at the first page, is that the
9 original in Chinese characters?

10 **A** It is.

11 **Q** And what's the date of this E-Mail?

12 **A** February the 3rd of 2018.

13 MR. MANGAN: If we can turn to the next page?

14 (Government's Exhibit 68 page two was shown on the screen
15 for Jury.)

16 **BY MR. MANGAN:**

17 **Q** Can you read the content that was sent?

18 **A** "Section Chief Qu, please review the attachment and
19 let me know if something like this is the system code
20 you mentioned in the WeChat. Thank you."

21 **Q** All right.

22 MR. MANGAN: And then let's take a look at the
23 attachment.

24 (Government's Exhibit 68 page three was shown on the screen
25 for Jury.)

1 BY MR. MANGAN:

2 Q This attachment, where did you get this, Agent Hull?

3 A I got it from GE Aviation.

4 Q Okay. And so was this cleared by them to be
5 presented?

6 A It was.

7 Q All right.

8 MR. MANGAN: And we can take that down.

9 BY MR. MANGAN:

10 Q Was this part -- explain why you were sending
11 this?

12 A In a, in an intelligence operation if someone is
13 trying to recruit a source, often the source better give
14 them something or they're going to lose interest. So we
15 sent something in order to show our willingness to supply
16 information.

17 Q All right.

18 MR. MANGAN: Let's take a look at the next E-Mail.

19 THE COURT: I'm ready to pause if it's appropriate.

20 MR. MANGAN: Yes, Your Honor.

21 THE COURT: Very well. Doing this in 30-minute
22 chunks. I'm going to give you a 15-minute break, Jurors.
23 During the break, take the break. Don't discuss the case
24 among yourselves or with anyone else. No independent
25 research. Continue to keep an open mind.

1 We'll rise as you leave.

2 COURTROOM DEPUTY: All rise for the Jury.

3 (Jury exited the Courtroom.)

4 THE COURT: We're breaking for 15 minutes. The
5 Jury's left the room. Door's closed. We'll break for
6 15 minutes. I'll see you in approximately 2:17.5. We're in
7 recess.

8 COURTROOM DEPUTY: All rise. This Court is now in
9 recess.

10 (Court was in recess at 2:03 p.m. and resumed at 2:18 p.m.)

11 COURTROOM DEPUTY: All rise. This Court is in
12 session pursuant to the recess.

13 THE COURT: Thank you. Please be seated. Are we
14 ready to get the Jury from the Government's perspective?

15 MR. MANGAN: Yes, Your Honor.

16 THE COURT: The Defense?

17 MR. McBRIDE: Yes, sir.

18 THE COURT: Very well. Let's call for the Jury.

19 COURTROOM DEPUTY: All rise for the Jury.

20 (Jury entered the Courtroom.)

21 THE COURT: You may all be seated. 15 Jurors have
22 rejoined us after the break. Welcome back, ladies and
23 gentlemen. We're going to proceed with the taking of
24 testimony. Witness remains under oath.

25 Mr. Mangan, you can proceed when you're ready.

1 MR. MANGAN: Thank you. If we can go back to the
2 publication for Exhibit 68?

3 THE COURT: Yes, Exhibit 68 will be publish.

4 MR. MANGAN: Page three.

5 (Government's Exhibit 68 page three was shown on the screen
6 for Jury.)

7 **BY MR. MANGAN:**

8 **Q** Was this the attachment, Agent Hull?

9 **A** Yes.

10 **Q** All right. And just to clarify, the part at the
11 bottom where it says, Attorney's Eyes Only, that is not part
12 of the display?

13 **A** It is not.

14 **Q** All right. But the part in the middle, can you read
15 what that states?

16 **A** Which section in particular? I'm sorry.

17 **Q** I'm sorry. The bottom middle?

18 **A** GE Designated -- CONFIDENTIAL.

19 **Q** All right. And that was on this slide when it was
20 sent?

21 **A** Yes, it was.

22 **Q** And looking at the very top where it says -- can you
23 read what the title of the slide?

24 **A** GE9X Fan Containment Case Design Consensus Review.

25 **Q** And do you know what the GE9X is?

1 **A** Yes.

2 **Q** And what is it?

3 **A** It's their next-generation commercial aircraft engine.

4 **Q** All right.

5 MR. MANGAN: If we could take that down? Okay. If
6 we can take that down, and please publish Exhibit 69?

7 THE COURT: Yes.

8 (Government's Exhibit 69 was shown on the screen for Jury.)

9 **BY MR. MANGAN:**

10 **Q** Was this the next E-Mail that was sent?

11 **A** (Witness reviews exhibits.) Yes.

12 **Q** All right. And did this have an attachment -- or
13 excuse me -- a picture that was enclosed as an attachment?

14 **A** Yes.

15 **Q** All right.

16 MR. MANGAN: All right. If we can turn to the next
17 page? On page 69, we'll zoom in.

18 (Government's Exhibit 69 page two was shown on the screen
19 for Jury.)

20 **BY MR. MANGAN:**

21 **Q** Was this an E-Mail that was sent to the GE employee?

22 **A** Yes, it was.

23 **Q** All right. Can you read what was written?

24 **A** "Hello teacher. I received the document you sent me.

25 Since I am not the expert in this field, I want you to

1 spend some time to dialogue with the experts in China
2 for a more precise connection. How about the eighth
3 day after New Year, which is 2/23?
4 Also, attached file is some domestic requirements that
5 I know of, can you take a look and let me know if you
6 are familiar with these."

7 **Q** All right. And then it had this attachment; correct?

8 MR. MANGAN: If we can turn to page three?

9 (Government's Exhibit 69 page three was shown on the screen
10 for Jury.)

11 **BY MR. MANGAN:**

12 **Q** Is that the picture of the attachment?

13 **A** Yes, it is.

14 **Q** All right.

15 MR. MANGAN: And the translation please, on page
16 four?

17 (Government's Exhibit 69 page four was shown on the screen
18 for Jury.)

19 **BY MR. MANGAN:**

20 **Q** Can you read what was sent by the Defendant in this
21 E-Mail?

22 **A** "Regarding the current development situation and
23 future development direction of foreign countries's
24 structural materials for fan rotor blades made from
25 composite materials:

1 For example, how many generations of prepreg have been
2 developed? What is the model of each generations of
3 prepreg.

4 Regarding the design criteria for foreign countries's
5 composite material rotor fan blade, stator fan blade,
6 and fan casing:

7 For example:

8 Which baseline value is used in the design -- A or B?

9 What type of confidence level is used?

10 What software programs are used during designing?

11 Is the virtual simulation technology used for
12 developing design and manufacture?

13 How are the allowed values for 3-D braided structural
14 material and allowed value for design obtained? What
15 are the relevant criteria?

16 Has the fiber hybrid braided structure already been
17 used in application? Has the layering at plus/minus
18 30 degrees already been used in application."

19 **Q** Now, Agent Hull, is this the translation of the
20 questions that were sent to the GE employee?

21 **A** Yes.

22 **Q** If we look back up at that first line where it talks
23 about "future development direction of foreign countries's
24 structural materials," did you see that?

25 **A** I did.

1 **Q** Was that language that you noticed when you received
2 this?

3 **A** It was.

4 **Q** Why was that significant to you?

5 **A** Because GE Aviation is the only company in the world
6 that uses composite fan blades or rotors.

7 **Q** All right. And if we go down to the third page, does
8 that again use the phrase -- or use a phrase "design
9 criteria for the foreign countries's composite material
10 rotor fan blade, stator fan blade and fan casing?" Again,
11 was the reference to foreign countries's significant to
12 you?

13 **A** Yes, it was.

14 **Q** How so?

15 **A** To the best of my knowledge, no one within the
16 aviation industry outside of GE Aviation uses composite
17 materials for fan blades, which would indicate that someone
18 outside of China, and the only company that I'm aware of is
19 GE Aviation.

20 **Q** All right.

21 MR. MANGAN: Now, if we can take a look at the next
22 exhibit, please? If we could publish Exhibit 70?

23 THE COURT: Yes.

24 (Government's Exhibit 70 was shown on the screen for Jury.)

25 **BY MR. MANGAN:**

1 Q Is this another E-Mail that was sent in this chain?

2 A It is.

3 MR. MANGAN: Can we turn to page two for the
4 translation?

5 (Government's Exhibit 70 page two was shown on the screen
6 for Jury.)

7 MR. MANGAN: We'll zoom in.

8 **BY MR. MANGAN:**

9 Q Was this another E-Mail that was received from the
10 Defendant around the same time?

11 A Yes.

12 Q And was this sent on or about February 5, 2018?

13 A Yes.

14 Q So the last E-Mail that we just discussed with the
15 list of questions and this E-Mail, did they come pretty
16 close in time to each other?

17 A They did.

18 Q All right. Can you read what was written in this
19 E-Mail?

20 A Subject was "Directory. Mr. -- blank -- can you sort
21 out a directory for your return trip to China."

22 Q All right.

23 MR. MANGAN: All right. If we can turn to page
24 three?

25 (Government's Exhibit 70 page three was shown on the screen

1 for Jury.)

2 **BY MR. MANGAN:**

3 **Q** There was another message followed up right after
4 that.

5 MR. MANGAN: Let's turn to the translation on page
6 four.

7 (Government's Exhibit 70 page four was shown on the screen
8 for Jury.)

9 **BY MR. MANGAN:**

10 **Q** Again, this is on February 5, 2018. Can you read the
11 instructions that were sent?

12 **A** "Here is how: Step 1, create a Notepad document --
13 parentheses, text format, end parentheses.

14 Step 2, open it and enter the following content
15 dir/s/n>directory.txt.

16 Remember not to use quotation mark. Then click Save
17 As. File Name column changes to, quote,
18 directory.bat, end quote. Remember to delete the txt
19 extension. File type changes to All Files. Double
20 click to run.

21 You can move this, quote, directory.bat, unquote, to
22 any folder, double click and will generate the
23 directory of current folder."

24 **Q** Were these the instructions that were received by the
25 GE Aviation employee?

1 **A** Yes, they were.

2 **Q** And they were sent by whom?

3 **A** The Defendant.

4 **Q** And this was on or around the same time he sent the
5 list of questions we just discussed?

6 **A** Yes.

7 **Q** All right. Prior to this, had there been any
8 reference in the communications to a computer file
9 directory?

10 **A** No.

11 **Q** Was this the first mention of it?

12 **A** Yes.

13 **Q** All right. Let's turn back to the WeChats. Just for
14 context, did the communication sometimes go from a WeChat to
15 an E-Mail to a WeChat?

16 **A** Often.

17 **Q** All right. Let's turn back to the WeChats around this
18 time.

19 MR. MANGAN: If we can turn to Exhibit 67c page
20 15?

21 (Government's Exhibit 67c page 15 was shown on the screen
22 for Jury.)

23 THE WITNESS: (Witness reviews exhibit.)

24 **BY MR. MANGAN:**

25 **Q** All right. Did you draft the messages that are in

1 green there?

2 **A** I did.

3 **Q** Okay. Let's go ahead and read these two messages,
4 please?

5 **A** "Hello Section Chief Qu. The E-Mail sent from the
6 Sina E-Mail address was placed in the Junk Folder by
7 the system. I just saw it today. Smiley face emoji."
8 "I am familiar with most of the topics you mentioned.
9 Regarding answering these questions, some of the
10 topics are more sensitive than others because of the
11 involvement of GE intellectual property and commercial
12 secret, such as the previous E-Mail I sent you.
13 Regarding the topics mentioned in the E-Mail
14 attachment you sent, can you amply explain which is
15 more important."

16 **Q** All right. And when you say, "I'm familiar with most
17 of the topics you mentioned," what are you referring to?

18 **A** The list of questions that were sent in the E-Mail.

19 **Q** Okay. All right. During this time, it's
20 February 2018; correct?

21 **A** Yes.

22 **Q** Is the GE employee still working at GE?

23 **A** No.

24 **Q** Explain what the situation is there?

25 **A** The employee had been suspended on, on November

1 the 1st of 2017; and at our request, GE Aviation did not
2 terminate him. He was suspended so that his profile would
3 still exist in the GE directory.

4 Q All right. Was that done so the other employees
5 wouldn't necessarily know either?

6 A Yes.

7 Q All right. And is that something the company could
8 have said no to?

9 A They absolutely could have said no.

10 Q All right. After that text message -- or excuse me --
11 that chat message that just sent back, I believe there was
12 another E-Mail.

13 MR. MANGAN: If we could publish Exhibit 71?

14 THE COURT: Yes.

15 (Government's Exhibit 71 was shown on the screen for Jury.)

16 MR. MANGAN: Thank you.

17 **BY MR. MANGAN:**

18 Q And is this dated February 7, 2018?

19 A It is.

20 Q And, again, is this from the Defendant?

21 A Yes.

22 MR. MANGAN: Can we turn to page two, please?

23 (Government's Exhibit 71 page two was shown on the screen
24 for Jury.)

25 **BY MR. MANGAN:**

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1 **Q** If you could read the response that was written in
2 here?

3 **A** "Hello Mr. -- I received your WeChat. Regarding the
4 concerns in the content, I recommend we talk about it
5 when we see each other in Nanjing.

6 As for the schedule, are you taking high-speed rail
7 over right -- it should be night -- after you arrive
8 in Shanghai at 19:00 on 2/11 or would you come over
9 the next morning?

10 Have you booked the ticket for high-speed rail? Do
11 you need us to book it for you?

12 Do you need us to arrange a ride to receive you?

13 Also, will you have a domestic cell phone number by
14 then? Qu."

15 **Q** Okay. Agent Hull, this is discussing the meeting at a
16 time and place in China; correct?

17 **A** Correct.

18 **Q** As part of your plans, did you have any plans in
19 sending the employee back to China with GE information?

20 **A** No.

21 **Q** Okay. But did you want to continue the communication?

22 **A** I did.

23 **Q** All right.

24 MR. MANGAN: If we can turn then back to the chats?
25 We'd like to publish Exhibit 67c again.

1 THE COURT: Yes.

2 MR. MANGAN: We're now on page 16.

3 (Government's Exhibit 67c page 16 was shown on the screen
4 for Jury.)

5 **BY MR. MANGAN:**

6 **Q** Is this the next message that you created?

7 **A** Yes, it is.

8 **Q** All right. Can you read that to the Jury, please?

9 **A** "Hello Section Chief Qu, I have an unfortunate news to
10 inform you. I can't go back for the New Year this
11 year. The boss in the company asked me to take a
12 business trip to France in March to work on something
13 related to the project. Since there are many things
14 that need to be prepared, he thinks it's inappropriate
15 to take a two-week vacation now. I am so sorry about
16 this."

17 Seven minutes later. "Because the ticket already
18 booked is not refundable, even my parents are very
19 disappointed when I called them today. I really want
20 to keep a good relationship with you and the Science
21 and Technology Association. I hope you can
22 understand."

23 **Q** All right.

24 MR. MANGAN: Now, if we can turn to the next page?
25 We'll continue on, and I'll read the responses.

1 (Government's Exhibit 67c page 17 was shown on the screen
2 for Jury.)

3 **BY MR. MANGAN:**

4 **Q** "No worry, when do you plan on visiting next time?"

5 **A** "It's hard to say at this moment."

6 **Q** "If there's a plan, it would be easier for me to make
7 the arrangement here, but if not, it's totally fine.
8 Welcome to visit next time and we can then talk about
9 the cooperation. Keep in touch?"

10 MR. MANGAN: If we go to next page?

11 (Government's Exhibit 67c page 18 was shown on the screen
12 for Jury.)

13 THE WITNESS: "Hello Section Chief Qu, first, may
14 you have a happy New Year, have a happy family and
15 may everything goes well by your will!"

16 "I still feel sorry that I can't go back for New
17 Year and meet with you guys. I will E-Mail a copy
18 of the directory from my company computer per your
19 instruction. Please check."

20 "Also, regarding the plane ticket to China, because
21 it was already booked, it is not refundable. Is
22 there away for you to reimburse it? Thank you!"

23 **BY MR. MANGAN:**

24 **Q** "Can we resolve all these issues the next time you
25 come back?"

1 MR. MANGAN: And then if we turn to the next page,
2 page 19 at the very bottom is the next message?

3 (Government's Exhibit 67c page 19 was shown on the screen
4 for Jury.)

5 **BY MR. MANGAN:**

6 **Q** "May you have a joyful family, healthy body, good
7 fortunate, and things go by your will!!!"

8 All right. So that's at the bottom of page 19.

9 He mentions in that about, "I can prepare a laptop
10 directory"; correct?

11 **A** Yes.

12 **Q** And did you work on something like that with GE?

13 **A** Yes.

14 **Q** Can you explain what you did there?

15 **A** I went to GE, and I indicated that I had a, a code
16 that had been provided by the Defendant; and I inquired as
17 to their cooperation to run that on the GE Aviation air's --
18 GE Aviation engineer's computer, and then if they would be
19 willing to provide a portion of that material to the F.B.I.
20 for use.

21 **Q** All right. And did they do so?

22 **A** They did. They ran the, the file per the instructions
23 from the Defendant, and then they modified the content to
24 remove some of the most sensitive material that was on the
25 computer of the GE Aviation engineer.

1 **Q** All right. And so after it was modified, was it
2 provided by GE?

3 **A** It was.

4 **Q** Okay. And were you able to then use it in your
5 investigation with their permission?

6 **A** Yes.

7 **Q** All right.

8 MR. MANGAN: We'd like to publish Exhibit 72.

9 THE COURT: Yes.

10 (Government's Exhibit 72 was shown on the screen for Jury.)

11 MR. MANGAN: If we can turn to page two, please?

12 (Government's Exhibit 72 page two was shown on the screen
13 for Jury.)

14 **BY MR. MANGAN:**

15 **Q** Is this the E-mail that you sent back?

16 **A** Yes, it is.

17 **Q** By the way, did it take a little bit of time for them
18 to work through this directory issue?

19 **A** It did. It was a -- it was a big ask.

20 **Q** Okay. You said it was a big ask?

21 **A** Yes, it was.

22 **Q** Okay. All right. What is the date of this E-Mail?

23 **A** February the 14th of 2018.

24 **Q** And was this an E-Mail that you drafted for the GE
25 employee?

1 **A** Yes, it is.

2 **Q** All right. Thank you. Can you read, read the text of
3 the E-Mail?

4 **A** "Section Chief Qu, attached is the directory from my
5 company computer. Please take a look to see if there
6 is anything you need. Thank you! Happy New Year!"

7 **Q** All right.

8 MR. MANGAN: And then if we could turn to the next
9 page just to show a sample of the attachment?
10 (Government's Exhibit 72 page three was shown on the screen
11 for Jury.)

12 **BY MR. MANGAN:**

13 **Q** Is the directory a fairly long document?

14 **A** Yes. After editing, it was 66 pages long.

15 **Q** Okay. And in looking at this page three of the
16 exhibit, is this the first page of the directory?

17 **A** Yes, it is.

18 **Q** All right.

19 MR. MANGAN: And if we can turn a couple pages
20 back? Maybe page five or six? Sorry.

21 (Government's Exhibit 72 page seven was shown on the screen
22 for Jury.)

23 **BY MR. MANGAN:**

24 **Q** All right. Is this just an example of some of the
25 information that was provided on there?

1 **A** Yes, it is.

2 **Q** All right. And the specific files that are listed,
3 the actual files were not provided; correct?

4 **A** No. Just the name of the files were provided.

5 **Q** So this is sort of a table of contents, if you will?

6 **A** Right. It's the menu of what was on the computer.

7 **Q** All right. Thank you.

8 MR. MANGAN: Let's go back to the chats and see
9 where this picks up after you sent the computer directory.
10 (Government's Exhibit 67c was shown on the screen for Jury.)

11 **BY MR. MANGAN:**

12 **Q** Now, this directory, again, was this requested from
13 the Defendant --

14 **A** Yes, it was.

15 **Q** -- or by the Defendant?

16 **A** Yes.

17 **Q** All right. And did things change after you sent this
18 directory?

19 **A** Yes, the pace of the communication increased.

20 MR. MANGAN: Let's go back to the Exhibit 67c in
21 the WeChats. Page 20, please.

22 (Government's Exhibit 67c page 20 was shown on the screen
23 for Jury.)

24 THE WITNESS: I apologize. Mine ends at page 18.

25 MR. MANGAN: Well, that's not good. If we could

1 see if there's another copy perhaps that would help speed
2 things up? One moment, Your Honor.

3 **BY MR. MANGAN:**

4 **Q** Why don't we do this, would you mind reading off the
5 screen?

6 **A** I'll try.

7 **Q** All right. All right. If we could look at the
8 messages, starting on February 16, 2018. The E-mail that
9 sent the directory, was that Valentine's Day?

10 **A** Yes.

11 **Q** All right. And so a couple days later, you sent the
12 message at the top. Go ahead.

13 **A** "Here comes New Year's greetings! Wishing you success
14 in the coming year, may your wishes come true, and
15 well wishes to your family. Happy Year of the Dog!"

16 **Q** All right. And I'll read the responses. "Teacher,
17 Employee 1, how long will you be staying in France in
18 March?"

19 "Do you have any other plans to visit other countries
20 in the first half of the year?"

21 "I am preparing the proposal for my foreign studies
22 and visits this year, if convenient, maybe I can meet
23 you in the foreign country?"

24 "The U.S. is not in my plan, which is why I want to
25 meet you in other countries. This depends on your

1 convenience?"

2 MR. MANGAN: If you can turn to the next page?

3 (Government's Exhibit 67c page 21 was shown on the screen
4 for Jury.)

5 **BY MR. MANGAN:**

6 **Q** And then there's some messages that pick up with your
7 messages at the bottom half?

8 **A** "Hello Section Chief Qu, sorry I was too busy in the
9 past two days that I didn't reply on time. I will be
10 going on a business trip to France for two weeks, but
11 the concrete time has not been set."

12 "It's because we are busy working on testing engines
13 and my boss doesn't want me to set the travel dates."

14 MR. MANGAN: If we could scroll down?

15 (Government's Exhibit 67c page 21 was shown on the screen
16 for Jury.)

17 THE WITNESS: "I think it would be from mid-March
18 to mid -- to late Apr--, to late March, latest
19 would be at the beginning of April."

20 **BY MR. MANGAN:**

21 **Q** All right. Okay. And were these the first messages
22 after the directory had been sent to him?

23 **A** After -- no, after his response back asking about
24 France, then yes.

25 **Q** Okay. Let's turn then to another E-Mail that was

1 sent.

2 MR. MANGAN: If we could publish Exhibit 73,
3 please?

4 (Government's Exhibit 73 was shown on the screen for Jury.)

5 MR. MANGAN: And turn to page two for the
6 translation?

7 (Government's Exhibit 73 page two was shown on the screen
8 for Jury.)

9 **BY MR. MANGAN:**

10 **Q** All right. What is the date of this E-Mail?

11 **A** February the 23rd of 2018.

12 **Q** And what is the date -- or I'm sorry. Who is this
13 from?

14 **A** This is from the Defendant.

15 **Q** All right. Can you read the content of the E-Mail,
16 please?

17 **A** "Happy New Year! I have received your mail. How long
18 will you stay in France in March? Do you have any
19 other plans to visit other countries during the first
20 half of the year?

21 I am working on the travel plans for this year's
22 research trips. If it is convenient for you, we can
23 meet again in the other overseas. The U.S. is not on
24 my foreign travel list this year, so I'd like to meet
25 you in other countries. Please let me know which

1 country is convenient for you to meet.

2 In addition, I need to ask you about a few specific
3 terms in the material sent by you last time: Colon,
4 PSE, VSE, Trenchfiller, Hat Stiffener and
5 document 2695M84 -- what are those referring to?

6 Thank you! Qu."

7 **Q** Okay. Agent Hull, so this E-Mail was -- you received
8 this; correct?

9 **A** Yes.

10 **Q** All right. And there's an invitation to meet in other
11 countries; correct?

12 **A** Correct.

13 **Q** The question that he has at the bottom regarding VSE
14 and Trenchfiller, I'm sure the Jury knows, but for my
15 benefit, do you know what those refer to?

16 **A** I did at one point, but they are all terms that were
17 in the documents that were sent over in the file
18 directory.

19 **Q** Okay. So those are terms in the directory files?

20 **A** Yes.

21 **Q** All right.

22 MR. MANGAN: If we could turn to -- back to
23 Exhibit 67c then? Starting on page 21.

24 (Government's Exhibit 67c page 21 was shown on the screen
25 for Jury.)

1 MR. MANGAN: I'm sorry. We've already read those.

2 BY MR. MANGAN:

3 Q Correct?

4 A Yes.

5 Q All right.

6 MR. MANGAN: So then going back the next page, page
7 22?

8 (Government's Exhibit 67c page 22 was shown on the screen
9 for Jury.)

10 BY MR. MANGAN:

11 Q There is the question, "do you have any other plans to
12 go to other countries?"

13 A "I need to think about it."

14 Q All right. "Teacher, can you make the arrangement
15 soon so I can arrange on my side?"

16 "Also, for France, are you going to Toulouse?"

17 A "Okay, I will try to make the arrangement as soon as
18 possible. For the itinerary to France, I will check
19 my company computer tomorrow to let you know."

20 "Also, I replied an E-Mail to your Sina E-Mail, please
21 check."

22 Q Were you interested in the reference to Toulouse?

23 A I was.

24 Q Why?

25 A The French aerospace company Airbus is headquartered

1 and does the majority of their manufacturing in and around
2 Toulouse.

3 **Q** All right. Now, at the bottom it mentions you replied
4 to an E-Mail in your Sina E-Mail. Did you draft a new
5 E-Mail?

6 **A** I did.

7 MR. MANGAN: Okay. If we could, please, publish
8 Exhibit 74?

9 THE COURT: Yes.

10 MR. MANGAN: And turn to page two.

11 (Government's Exhibit 74 page two was shown on the screen
12 for Jury.)

13 **BY MR. MANGAN:**

14 **Q** And is this answering his questions about those
15 particular terms?

16 **A** Yes, it is.

17 **Q** All right. And is the date of this February 25,
18 2018?

19 **A** Yes, it is.

20 **Q** And does the message say:

21 "Hello Minister Qu, sorry that your Sina E-Mail has
22 been placed in the junk folder by the system again.

23 I just saw it now. Speaking of the travel plan -- we
24 Have talked about it via WeChat. In terms of those
25 specific terms: PSE stands for Product Support

1 Engineering, and VSE stands for Vendor Substantiation
2 Engineering. As to the others, I think it is better
3 for us to go through them when we meet in person.

4 Thank you!"

5 All right. Was that the E-mail that you drafted?

6 **A** Yes, it is.

7 **Q** All right. And it was sent to the Defendant?

8 **A** Yes.

9 **Q** All right. Thank you.

10 MR. MANGAN: Let's go back to the chats.

11 (Government's Exhibit 67c page 22 was shown on the screen
12 for Jury.)

13 **BY MR. MANGAN:**

14 **Q** Now, if we pick up 67c, we just talked about the
15 arrangements on page 22.

16 MR. MANGAN: If we can turn to page 23?

17 (Government's Exhibit 67c page 23 was shown on the screen
18 for Jury.)

19 **BY MR. MANGAN:**

20 **Q** Your message is back?

21 **A** "Okay. Will do."

22 **Q** Okay. I don't think we had read it from the top down,
23 so. I'm sorry. Agent Hull, could you start at the top?

24 **A** "Okay. I will try to make the arrangements as soon as
25 possible. For the itinerary to France, I will check

1 my company computer tomorrow to let you know."

2 "Also, I replied an E-Mail to your Sina E-Mail, please
3 check."

4 **Q** Oh, I see. All right.

5 "If your schedule is set, please let me know so I can
6 confirm whether I can meet you in France?"

7 "Okay. I will check my inbox."

8 **A** Then we responded, "Okay, will do."

9 **Q** "Teacher, is your schedule to France set?"

10 (Government's Exhibit 67c page 24 was shown on the screen
11 for Jury.)

12 **BY MR. MANGAN:**

13 **Q** And then there is an connection error. Do you see the
14 various calls?

15 **A** Yes. He attempted to call the WeChat account a
16 handful of times.

17 **Q** Okay. And did you not pick up?

18 **A** No.

19 **Q** All right. Let's continue on. What's the next
20 message you sent?

21 **A** It was later that evening. "Hello Section Chief Qu,
22 sorry I missed your call. I was trying to put the
23 child to sleep, just got away from it. Smiley face
24 emoji. My itinerary to France is from 3/25 to 4/6.
25 The tentative hotel is Aigle Noir Hotel at

1 Fontainebleau and my boss is working on that. I will
2 let you know if there is any change."

3 MR. MANGAN: Then the next page.

4 (Government's Exhibit 67c page 25 was shown on the screen
5 for Jury.)

6 **BY MR. MANGAN:**

7 **Q** The message from the Defendant. "Do you have a
8 minute? Let's talk on the phone?"

9 **A** "How about another day? My family is sleeping."

10 **Q** "Or how about tomorrow?"

11 "It's because if we are meeting in France, there are
12 something I need touch base with you?"

13 **A** "Okay. I will let you know what time tomorrow. It
14 also depends on your time."

15 **Q** "I am whenever."

16 **A** "Okay."

17 **Q** "About what time tomorrow?"

18 **A** "I will reply you in the morning. When do you usually
19 go to bed in the evening."

20 (Government's Exhibit 67c page 26 was shown on the screen
21 for Jury.)

22 MR. MANGAN: All right. And then we go down to the
23 bottom. At the very bottom it picks up again.

24 **BY MR. MANGAN:**

25 **Q** "Any time before 1 AM."

1 **A** "Okay. Thanks!"

2 MR. MANGAN: If we can turn to next page?

3 (Government's Exhibit 67c page 27 was shown on the screen
4 for Jury.)

5 THE WITNESS: "I will be available at 11 AM today,
6 which means by your 12 AM. Can I call you by
7 then."

8 **BY MR. MANGAN:**

9 **Q** "Okay."

10 "Are you there?"

11 And then it says duration 14:27, was there actually a
12 phone call that occurred?

13 **A** Yes, there was.

14 **Q** By the way, there was a discussion about travel to
15 France, okay. At any point did you plan on having the GE
16 employee actually take a GE laptop to give to the
17 Defendant?

18 **A** No.

19 **Q** All right. What was the plan?

20 **A** To see if we could actually draw out the Defendant.

21 **Q** Out of China?

22 **A** Yes.

23 **Q** Okay. And did you plan to travel to Europe if that
24 occurred?

25 **A** Yes.

1 **Q** Okay. And were you going to have the GE employee
2 travel with you as well?

3 **A** If we had to.

4 **Q** Okay. Let's go to the recorded call then. Is that
5 the transcript we referred to earlier?

6 **A** It is.

7 **Q** All right.

8 MR. MANGAN: That's Exhibit 75b. May we publish
9 that transcript, Your Honor?

10 THE COURT: Yes.

11 (Government's Exhibit 75b was shown on the screen for Jury.)

12 **BY MR. MANGAN:**

13 **Q** Agent Hull, we're just going to read some excerpts
14 from this.

15 MR. MANGAN: If we could start on page three?

16 (Government's Exhibit 75b page four was shown on the screen
17 for Jury.)

18 MR. MANGAN: If we could go halfway down, please?

19 **BY MR. MANGAN:**

20 **Q** All right. I will, we'll start with the statement
21 from the Defendant saying, "uh, I myself" -- or actually one
22 above that. Where Qu says, "Uh, one more thing." I'll read
23 that part if you'll read the part for the GE employee?

24 **A** Yes.

25 **Q** "Uh, one more thing, which is, uh...You, are you, are

1 you going to be, to be in one place when you were in
2 France? Only one place, you are not going anywhere
3 else?"

4 **A** "Uh...I myself, myself would like to visit other
5 places. It depends on you. I think, I think, some of
6 my colleagues will go with me. I think, if we are to
7 meet each other, France is not the best place. I
8 myself -- we haven't been...I have only been to
9 Europe once. Yeah, I do want to go to Belgium,
10 Netherlands, and Germany. I would like to go there
11 and look around. If it works for you, I think, in
12 those places...if I tell my colleagues that I will go
13 to those places, I don't think they will go. They
14 won't go. I think it is better we meet somewhere in
15 those places."

16 **Q** "Uh...are you saying, are you saying -- You think it
17 is better to meet in Belgium, Netherland, or Germany,
18 right?"

19 **A** "Right, right."

20 **Q** "Ah, that will work too. So, do you think...That
21 means...So we can choose...Do you prefer...I see that
22 there's a weekend during the course of your trip.
23 Right?"

24 (Government's Exhibit 75b page four was shown on the screen
25 for Jury.)

1 THE WITNESS: "Right."

2 BY MR. MANGAN:

3 Q "You want to go there over that weekend, right?"

4 A "Right, yeah, because weekend...On week days, on week
5 days, I think we will be very busy because we need to
6 do experiments, discussions, and review. UH...quite
7 many things."

8 Q All right. Let's kind of break there and move forward
9 to the next page.

10 THE COURT: Speaking of breaks, could we break
11 now?

12 MR. MANGAN: Sure, Your Honor. Yes.

13 THE COURT: Very well. We're doing this in
14 30-minute chunks. We're going to take another break.
15 20-minute break.

16 During the break, please take a break. Keep an
17 open mind. Don't talk about it among yourselves or with
18 anyone else. No independent research.

19 We'll rise as you leave.

20 COURTROOM DEPUTY: All rise for the Jury.

21 (Jury exited the Courtroom.)

22 THE COURT: 20 minute break. Jury's left the room.
23 We're in recess.

24 COURTROOM DEPUTY: All rise. This Court is now in
25 recess.

1 (Court was in recess at 2:53 p.m. and resumed at 3:14 p.m.)

2 COURTROOM DEPUTY: All rise. This Court is in
3 session pursuant to the recess.

4 THE COURT: Thank you. Please be seated. Will you
5 push the door closed, please? We're back in session. Is
6 the Government ready to proceed?

7 MR. MANGAN: We are, Your Honor.

8 THE COURT: The Defense as well?

9 MR. McBRIDE: Yes, Your Honor.

10 THE COURT: We're doing this in 30-minute chunks.
11 It will get us toward about a quarter of four, then we'll
12 break again until a little after four. Do you anticipate
13 getting the witness through direct today, yes or no?

14 MR. MANGAN: Through direct, yes.

15 THE COURT: Okay. Let's call for the Jury,
16 please.

17 COURTROOM DEPUTY: All rise for the Jury.
18 (Jury entered the Courtroom.)

19 THE COURT: You may all be seated. The Jurors, all
20 15, have returned to the courtroom. Welcome back, ladies
21 and gentlemen. We'll continue to hear the taking of
22 testimony. The witness remains under oath. You may proceed,
23 Mr. Mangan.

24 MR. MANGAN: Thank you, Your Honor.

25 BY MR. MANGAN:

1 **Q** Agent Hull, we were going through the transcript of a
2 recorded call; do you recall that?

3 **A** Yes.

4 **Q** And who is the call between?

5 **A** The GE Aviation engineer and the Defendant.

6 MR. MANGAN: All right. We'd like to pick up in
7 Exhibit 75b on page five, please?

8 (Government's Exhibit 75b page five was shown on the screen
9 for Jury.)

10 **BY MR. MANGAN:**

11 **Q** All right. If we can start with the statement about,
12 "How about your --" I'll read the part from the Defendant.

13 "How about your, how about your flight ticket? Can
14 you change it by one day? I mean, can you stay in
15 France one more day?"

16 **A** "You mean stay in France one more day? France..."

17 **Q** "Eh."

18 **A** "If I can change it, are you saying that I can change
19 the date and then we will meet in France? In France,
20 Uh..."

21 **Q** "Right, because I am worried that I don't have enough
22 time to get my Visa. Is it possible? I'm not saying
23 it must be extended; I am just wondering if that is a
24 possibility?"

25 **A** "Uh...let me see. I've got to go online and find out

1 if I can make a change. In addition..."

2 **Q** "Don't change just yet, I just, just, just, just want
3 to know -- or want to see if that is possible?"

4 **A** "Eh? I also think..."

5 **Q** All right. Why don't we stop there.

6 MR. MANGAN: And then I'd like to go forward to
7 page seven.

8 (Government's Exhibit 75b page seven was shown on the screen
9 for Jury.)

10 **BY MR. MANGAN:**

11 **Q** Were there ongoing discussions about locations and
12 times and logistics?

13 **A** Yes, there were.

14 **Q** All right. Let's pick it up with the statement, "If
15 we can go to Netherland," and we'll read through the bottom
16 of page seven and eight; okay?

17 "If we can go to Netherland, that will work. If we
18 can meet in Netherland or Belgium, that will work too.
19 That is what I think. Hmm?"

20 **A** "Hmm."

21 **Q** "Uhm."

22 **A** "It all depends on your Visa then. I mean, as long as
23 you get a Visa, you can go to all these countries.
24 Also, train service is convenient there. I didn't
25 plan well last time. Time was pressing, and --

1 laughs -- my child came long; it was not so
2 convenient -- chuckle."

3 Q "Right, right, right."

4 A "Right."

5 Q "Ah..."

6 A "Traveling with a child, I just want to come back as
7 soon as possible."

8 Q "Uh, by the way, because you sent me a document list
9 last time --"

10 A "Hmm."

11 Q "-- we took a look. I think that, uh, uh, that is
12 pretty good stuff. I wonder if it is convenient for
13 to you bring that stuff...this time to Europe, if you
14 can bring that stuff along?"

15 A "I for sure will bring my computer with me. My
16 computer and that..."

17 Q "Oh, but --"

18 A "Hum."

19 (Government's Exhibit 75b page eight was shown on the screen
20 for Jury.)

21 **BY MR. MANGAN:**

22 Q "-- the computer you will bring is the one your
23 company issued to you, right?"

24 A "Right."

25 Q "The notebook, right?"

1 **A** "Right. But I can, I can..."

2 **Q** "Uh..."

3 **A** "I can copy if necessary."

4 **Q** "The thing is, the thing is, can you export the stuff
5 out?"

6 **A** "I can export it. It has, it has..."

7 **Q** "You can export it -- you can export it. Good."

8 **A** "-- a portable hard drive."

9 **Q** "Ah, ah, ah."

10 **A** "Right."

11 **Q** "Good, good, good."

12 **A** "Right."

13 **Q** "So, if possible, we will look over, eh, the stuff.
14 Can we do that?"

15 **A** "We can."

16 **Q** "Do you understand? Carry the stuff along."

17 **A** "I certainly will have the computer."

18 **Q** "Take a look."

19 **A** "I always carry the hard drive during business travel,
20 just in case I myself, say, I need something for
21 myself."

22 **Q** "Good, good, good."

23 **A** "Right."

24 **Q** "Oh, one more thing. I don't know, because, just in
25 case, just in case, do you have any plan for going to

1 China this year?"

2 (Government's Exhibit 75b page nine was shown on the screen
3 for Jury.)

4 THE WITNESS: "For now --"

5 **BY MR. MANGAN:**

6 **Q** "Say during Easter."

7 **A** "-- for now, no because my child is too little. It's
8 too much trouble to fly. Hmm."

9 **Q** Okay. All right. And then do they continue to talk
10 about things like green cards?

11 **A** They do.

12 MR. MANGAN: Let's continue on on page 11, if we
13 could? At the bottom of page 11.

14 (Government's Exhibit 75b page 11 was shown on the screen
15 for Jury.)

16 **BY MR. MANGAN:**

17 **Q** I'll start with the line, "I just need to get a
18 Schengen Visa?"

19 **A** Right.

20 **Q** "I just need to get a Schengen Visa. That is all I
21 need. The next thing is to pick a date. Okay?"

22 **A** "Okay, okay."

23 **Q** "We will just, like you said, pick a day over that
24 weekend to meet each other. Right? We will meet up
25 over that weekend?"

1 **A** "Right, right, right."

2 **Q** "Meet up over the weekend. Eh, great, great. Let's
3 do this -- You go ahead?"

4 **A** "Also, another thing, do you, Section Chief Qu, do
5 you -- regarding the material, I mean the material on
6 my computer, are you interested in...I mean, is there
7 anything else you might -- uh, be interested in."

8 (Government's Exhibit 75b page 12 was shown on the screen
9 for Jury.)

10 **BY MR. MANGAN:**

11 **Q** "What? I didn't hear that clearly."

12 **A** "I was saying if there is other, other information
13 that you guys might be interested in. I mean, I can
14 look around and prepare, besides the directory I gave
15 you last time."

16 **Q** "Uh, how about this...I think, uh, actually what you
17 sent me last time is good enough --"

18 **A** "Good enough, okay."

19 **Q** "-- because if we need something new later, we can,
20 eh, talk about that in person when we meet?"

21 **A** "Good."

22 **Q** "What do you think?"

23 **A** "That will work. Okay, okay, okay. Great, let's do
24 this. You go ahead and work on the stuff. It's
25 getting late."

1 Q "All right. We really, we really don't need to rush
2 to do everything in one time, because, if we are going
3 to do business together, this won't be the last time,
4 right?"

5 A "Yeah, yeah."

6 Q "We can, in the future, uh...Let's take our time and
7 go about this on a long-term basis. How does that
8 sound?"

9 A "Right, right, right."

10 Q "Eh."

11 A "Okay, it is quite late already. Get some rest."

12 Q "So, now, that, the thing you told me last time, about
13 your company's layoffs. Has everything been settled?
14 It hasn't, right?"

15 A "Ah, the company, now, is under new, new leadership.
16 It hasn't happened yet for the time being, but people
17 are jittering. We have a couple colleagues, they were
18 shown the door."

19 Q "Oh."

20 A "Right. It is..."

21 (Government's Exhibit 75b page 13 was shown on the screen
22 for Jury.)

23 **BY MR. MANGAN:**

24 Q "Okay."

25 A "We're doing fine at the moment, but it is already,

1 already started in other places. Yeah."

2 Q "Right, right."

3 A "It is quite nerve wracking."

4 Q "Okay, good, good. Let's do this. I, on my end, I
5 will make an effort to meet you in Europe this month.
6 After we meet, you know what, for certain things, we
7 will talk about them when we see each other. I think
8 that is a better way. What do you think?"

9 A "Right. I agree with you. Yeah."

10 Q "Okay, okay, okay."

11 A "Okay. It is quite late. You have a good night."

12 Q "All right. Let's try our best to meet in Europe."

13 "Laughs?"

14 A "Good, good." "Laughs."

15 Q "Anyhow, if we need to communicate any details to you,
16 I will send them to you through WeChat?"

17 A "Right, send me through WeChat. Sometimes I don't get
18 it right away, but I usually reply at night. Yeah."

19 Q "Right, right, right. You just respond whenever you
20 see it?"

21 A "Okay, okay, okay."

22 MR. MANGAN: All right. And let's end there.

23 BY MR. MANGAN:

24 Q And those were excerpts from the recording; is that
25 correct --

1 **A** Yes.

2 **Q** -- Agent Hull? All right.

3 MR. MANGAN: Let's turn back to the WeChats in
4 Exhibit 67c. If we can pick up on page 28?

5 (Government's Exhibit 67c page 28 was shown on the screen
6 for Jury.)

7 **BY MR. MANGAN:**

8 **Q** The part that says duration, was that the actual phone
9 call we just discussed?

10 **A** Yes, it was.

11 **Q** All right. The next message from the Defendant, I'll
12 read: "Teacher, how about this? I am planning to meet you
13 in Amsterdam, Netherland, on the 31st?"

14 "If you can postpone one day on your flight ticket, we
15 can meet again in Paris on the 7th?"

16 "If you can't postpone, let's meet on the 6th."

17 "Also, I just checked, 4/1 is the Easter. Don't you
18 have holidays over that?"

19 MR. MANGAN: If we can go to next page?

20 (Government's Exhibit 67c page 29 was shown on the screen
21 for Jury.)

22 **BY MR. MANGAN:**

23 **Q** And your response?

24 **A** "Hello Section Chief Qu, first, happy Day of Lantern
25 Festival. There is no holiday on the April 1st in the

1 U.S., however, I am not sure about France and I will
2 have my boss to confirm on that. Also, it is spring
3 break in France at the moment. I probably wouldn't
4 hear back until next week."

5 "I can do either 4/6 or 4/7 in Paris as long as
6 there's no difference in plane ticket. It can be
7 modified over the website. Because 7th is a Saturday,
8 if there's a difference, I have to bear with the
9 difference. Sorry to ask this, but can you help out
10 on this."

11 MR. MANGAN: If we turn to next page.

12 (Government's Exhibit 67c page 30 was shown on the screen
13 for Jury.)

14 **BY MR. MANGAN:**

15 **Q** "No problem on the difference."

16 "This way, we need to keep our communication open."

17 **A** "Okay, thanks!"

18 **Q** "Don't change the itinerary yet, wait for my notice."

19 **A** "Okay."

20 **Q** "When is the latest possible time to meet in
21 Netherland?"

22 MR. MANGAN: If we can scroll down?

23 (Government's Exhibit 67c page 30 was shown on the screen
24 for Jury.)

25 THE WITNESS: "1st is Sunday, I think the latest

1 would be Monday the 2nd. Of course, it also
2 depends on the holidays in France branch."

3 BY MR. MANGAN:

4 Q "Okay. I will wait for your message."

5 (Government's Exhibit 67c page 31 was shown on the screen
6 for Jury.)

7 BY MR. MANGAN:

8 Q And on next page explain what that is?

9 A The image in the upper right-hand corner is a copy of
10 an itinerary of the GE Aviation employee for the travel to
11 France.

12 Q And if you can read the message, please?

13 A "Section Chief Qu, attached above is my itinerary to
14 France for your reference."

15 "Regarding the holidays around April 1st in France, I
16 will confirm it with you next week. Thanks."

17 Q Before I read the next part, can I ask you a question,
18 Agent Hull? In addressing the Defendant, it says Section
19 Chief Qu, was there a reason that phrase was used?

20 A Yes.

21 Q Why is that?

22 A In the messages with Chen Feng right about Christmas
23 of 2017, we were calling him Deputy Director Qu, and Chen
24 Feng called him Section Chief Qu, which is a slightly
25 nuanced character difference, but our understanding was

1 that -- our interpretation was that likely represented his
2 actual title within the MSS, so we sent that back as a bit
3 of a wink that we knew his association.

4 **Q** Okay. I'll continue with the message.

5 "Okay, if your ticket cannot be postponed, we can only
6 meet on 4th or 5th at Fontainebleau, would that work?"

7 "If postponed, we can meet on the 6th."

8 **A** "Okay."

9 MR. MANGAN: Let's turn to the next page. And that
10 continues at the bottom.

11 (Government's Exhibit 67c page 32 was shown on the screen
12 for Jury.)

13 **BY MR. MANGAN:**

14 **Q** Where it says, "let's --

15 MR. MANGAN: All the way at the bottom. Thank you.
16 (Government's Exhibit 67c page 32 was shown on the screen
17 for Jury.)

18 **BY MR. MANGAN:**

19 **Q** "Let's meet at Amsterdam on the 31st. Let me know
20 after you book a hotel there?"

21 **A** "Okay, please also let me know when you get your
22 Visa."

23 **Q** Okay.

24 MR. MANGAN: If we can turn to next page?
25 (Government's Exhibit 67c page 33 was shown on the screen

1 for Jury.)

2 **BY MR. MANGAN:**

3 **Q** You have an additional message after that.

4 **A** "Section Chief Qu, forgot to tell you one thing, the
5 company folder directory I sent you last time, some of
6 the documents within were generated from this specific
7 software, they can only be viewed and backed up when
8 the computer or external hard drive is connected to
9 the GE network."

10 **Q** "No worry, there's no need to go through every
11 document?"

12 "Does that mean I will not be able to view these
13 documents after I bring them back?"

14 (Government's Exhibit 67c page 34 was shown on the screen
15 for Jury.)

16 THE WITNESS: "I am not sure about it. I've never
17 tried to open those files when I was in China."

18 **BY MR. MANGAN:**

19 **Q** "No worry. Let's talk about it when we see each
20 other?"

21 **A** "Okay."

22 **Q** "Regarding the document directory you sent last time,
23 is it possible to dump it to a portable hard drive or
24 USB drive from work computer in advance?"

25 **A** "I can try, it should work."

1 Q What was your reaction to that particular question?

2 A It seemed like an indication of an ask.

3 Q All right. In terms of asking what?

4 A To take the contents of the GE Aviation computer and
5 put it on a portable hard drive or USB drive --

6 Q Or download it --

7 A -- before the trip.

8 Q Okay. I'll continue with the communications then.

9 MR. MANGAN: At the bottom of page 34.

10 (Government's Exhibit 67c page 34 was shown on the screen
11 for Jury.)

12 **BY MR. MANGAN:**

13 Q "Which cell phone are you going to bring with you?

14 Can you give me the number?"

15 "A backup contact method, just in case."

16 (Government's Exhibit 67c page 35 was shown on the screen
17 for Jury.)

18 THE WITNESS: "I will bring my personal cell phone
19 on the business trip. The cell phone number is the
20 same one I use to contact Chen Feng" and then a
21 phone number."

22 **BY MR. MANGAN:**

23 Q "Okay. Still using WeChat?"

24 A "Yes."

25 Q "Let me know the room number once you checked in.

1 Also, tell me the name of the hotel in Amsterdam?"

2 **A** "Okay."

3 MR. MANGAN: If we go to next page at the bottom?
4 (Government's Exhibit 67c page 36 was shown on the screen
5 for Jury.)

6 **BY MR. MANGAN:**

7 **Q** Does he send -- your last message was on what day?

8 **A** Can you scroll up, so I can see it?
9 (Government's Exhibit 67c page 35 was shown on the screen
10 for Jury.)

11 THE WITNESS: March the 7th.
12 (Government's Exhibit 67c page 36 was shown on the screen
13 for Jury.)

14 **BY MR. MANGAN:**

15 **Q** All right. And then there isn't a message until
16 March 10?

17 **A** Correct.

18 **Q** Okay. And, again, how far out are you from the
19 meeting date?

20 **A** Sort of two-ish weeks.

21 **Q** All right. Was the plan for March 31st or so?

22 **A** Yes.

23 **Q** Okay. I'll read the message dated March 10, 2018.

24 "Since there's still time, download more data and
25 bring them. Anything design related would work?"

1 **A** "Okay, got it."

2 **Q** "I got the Visa."

3 MR. MANGAN: If you'll turn to the next page?
4 (Government's Exhibit 67c page 37 was shown on the screen
5 for Jury.)

6 THE WITNESS: "Congratulations!! Have you booked
7 your flight ticket? When are you going to Europe?
8 Which airport."

9 MR. MANGAN: If we can scroll down?

10 THE WITNESS: "About the design date, besides the
11 composite fan blade and engine box we've dialogued
12 last time, what other designs are you interested
13 in? Please be more specific so I don't arouse too
14 much suspicion from downloading large amount of
15 information from company computer recently."

16 MR. MANGAN: All right. Let's go to next messages
17 starting on March 15, 2018, from the Defendant.

18 (Government's Exhibit 67c page 38 was shown on the screen
19 for Jury.)

20 **BY MR. MANGAN:**

21 **Q** "We will be in Greece first."

22 "We will still meet in Amsterdam on the 31st."

23 "You can go ahead and book the train ticket and room
24 in Amsterdam?"

25 "Teacher, have you booked a hotel in Amsterdam? When

1 are you going to be there?"

2 "If convenient, let's talk on the phone again before
3 your departure?"

4 (Government's Exhibit 67c page 39 was shown on the screen
5 for Jury.)

6 THE WITNESS: "Section Chief Qu, please pardon me
7 for not replying the WeChat message on time! I am
8 fully occupied at work, also, on top of that, I
9 need to prepare things for the trip. I have booked
10 the train ticket from Paris to Amsterdam and the
11 hotel in Amsterdam."

12 **BY MR. MANGAN:**

13 **Q** And then what are those items below that?

14 **A** Those are images of a French train ticket and a
15 screenshot of a hotel reservation in Amsterdam.

16 **Q** Why did you send that to him?

17 **A** Because he asked for it.

18 **Q** All right.

19 MR. MANGAN: If we turn to next page?

20 (Government's Exhibit 67c page 40 was shown on the screen
21 for Jury.)

22 MR. MANGAN: If we go down to the bottom?

23 **BY MR. MANGAN:**

24 **Q** If you'd read the next messages?

25 **A** "I have sent you a design related document to your

1 Sina E-Mail address, please check."

2 **Q** "Okay."

3 All right. Agent Hull, let's go to that E-Mail that
4 was sent.

5 MR. MANGAN: If we could publish Exhibit 76,
6 please?

7 THE COURT: Yes.

8 (Government's Exhibit 76 was shown on the screen for Jury.)

9 MR. MANGAN: And if we could turn to page two?
10 (Government's Exhibit 76 page two was shown on the screen
11 for Jury.)

12 **BY MR. MANGAN:**

13 **Q** And what is the date of this E-Mail?

14 **A** March the 21, 2018.

15 **Q** And can you read the content that was sent in this
16 E-Mail?

17 **A** "Section Chief Qu, for your reference, attached file
18 is a composite material engine box design related
19 document which we will be using for the meeting with
20 Safran in France."

21 **Q** All right.

22 MR. MANGAN: And if you can turn to the next page.
23 Actually page four would be the translation.

24 (Government's Exhibit 76 page four was shown on the screen
25 for Jury.)

1 BY MR. MANGAN:

2 Q Is there an additional E-Mail that was sent?

3 A Yeah. We didn't get the attachment connected to the
4 E-Mail.

5 Q Okay.

6 A So we sent it again.

7 Q So when was this E-Mail dated?

8 A Same date. Just a couple minutes later.

9 Q Okay. And what does the content that it says? Does
10 it just say, "Please find the attachment?"

11 A Yes.

12 Q And did you attach a PowerPoint slide?

13 A Two PowerPoint slides.

14 Q Okay. Let's take a look at those.

15 MR. MANGAN: Starting on next page.

16 (Government's Exhibit 76 page five was shown on the screen
17 for Jury.)

18 BY MR. MANGAN:

19 Q And what is this document?

20 A It's entitled GE Containment Analysis Technical Deep
21 Dive.

22 Q All right. And looking toward the bottom, do you see
23 a section where it says, GE PROPRIETARY INFORMATION?

24 A Yes, I do.

25 Q And is there a block of text there saying that the

1 information contained in this document is GE proprietary
2 information?

3 **A** Yes.

4 **Q** All right. Where did you obtain this document and the
5 next page?

6 **A** From GE Aviation.

7 **Q** Okay. And did they review it and consent to it being
8 sent?

9 **A** Yes, they did.

10 **Q** All right. And was this just -- was this an entire
11 presentation or just part of?

12 **A** No. It was just the first two pages.

13 **Q** All right.

14 MR. MANGAN: And if we can take a look at the next
15 page?

16 (Government's Exhibit 76 page six was shown on the screen
17 for Jury.)

18 **BY MR. MANGAN:**

19 **Q** Was this the next page of the presentation?

20 **A** Yes, it was.

21 **Q** And GE was able to review this and make any changes
22 they wanted to to the form?

23 **A** Yes.

24 **Q** And they did so before it was sent out?

25 **A** They did. Some of the numbers in the chart on the

1 bottom left were modified.

2 Q All right. Thank you.

3 MR. MANGAN: If we could take that exhibit down?

4 **BY MR. MANGAN:**

5 Q Now, you mentioned there was another WeChat handle
6 that was used; correct?

7 A Correct.

8 MR. MANGAN: If we could turn to Exhibit 77c, and
9 publish that?

10 THE COURT: Yes.

11 (Government's Exhibit 77c was shown on the screen for Jury.)

12 **BY MR. MANGAN:**

13 Q What is this, Agent Hull?

14 A This is a new WeChat communication string that was
15 initiated by the Defendant prior to the travel to Europe.

16 Q Okay. And so this was the new chat string that was
17 started at that point?

18 A Yes.

19 Q All right. And are you getting close to the actual
20 meeting time?

21 A Yes, we are. It happened -- this happened on March
22 the 23rd of 2018.

23 Q And at this time were you making preparations to go to
24 Europe yourself?

25 A Yes.

1 **Q** All right. Did the GE employee go with you?

2 **A** Not for the first leg.

3 **Q** Okay. Did he ultimately come over to Belgium with
4 you?

5 **A** Yes.

6 **Q** Okay. And was that in order to help facilitate these
7 ongoing communications?

8 **A** Yes.

9 **Q** All right. And did you have an F.B.I. translator with
10 you as well?

11 **A** Yes.

12 **Q** All right. I'd like to go through these chats as
13 well. And we'll start again. The icon that's on the left
14 in blue, is that the Defendant's WeChat handle?

15 **A** Yes, it is.

16 **Q** Okay. We'll start with, "Hello Teacher, this is my
17 WeChat?"

18 **A** "Hello Section Chief Qu! I don't see your new cell
19 phone number in this WeChat? Can you send it over."

20 **Q** "Teacher, this is another number I use: 17075269142."
21 (Government's Exhibit 77c page two was shown on the screen
22 for Jury.)

23 THE WITNESS: "Okay, thank! Let's keep in touch."

24 **BY MR. MANGAN:**

25 **Q** Agent Hull, did you recognize that phone number?

1 **A** Yes.

2 **Q** How so?

3 **A** It was the phone number on one of the devices seized
4 pursuant to his arrest in Belgium.

5 **Q** All right.

6 MR. MANGAN: If you can turn back to page two,
7 we'll continue.

8 (Government's Exhibit 77c page two was shown on the screen
9 for Jury.)

10 **BY MR. MANGAN:**

11 **Q** "Okay, teacher --

12 MR. MANGAN: Thank you.

13 **BY MR. MANGAN:**

14 **Q** "Okay, teacher. I am assuming you will be very busy
15 in the next couple of days. Contact me after you
16 land, let's keep in touch?"

17 **A** "Okay."

18 **Q** "Teacher, how's your trip and is there any change of
19 the work schedule in France?"

20 MR. MANGAN: Let's turn to the next page?

21 (Government's Exhibit 77c page three was shown on the screen
22 for Jury.)

23 THE WITNESS: "Hello Section Chief Qu, I am sorry I
24 didn't reply to your message on time in the past
25 couple of days due to busy schedule. The trip to

1 France is fairly smooth, however, the work schedule
2 has been changed. My boss has made me to travel to
3 the sub-branch of Safran in Belgium because we need
4 to provide some technical support to them for a
5 collaboration project."

6 "That says, I will not be able to make it to the
7 Amsterdam this Saturday. But, I can meet you at
8 the hotel in Brussels this Sunday afternoon. Since
9 I will be having meetings with Safran people this
10 coming Monday and Tuesday, Sunday afternoon is the
11 best time for us to meet."

12 **BY MR. MANGAN:**

13 **Q** Agent Hull, before we move on, what is Safran?

14 **A** Safran is a French aerospace company.

15 **Q** All right. And do they have a -- some working
16 relationship with GE Aviation?

17 **A** There's a joint venture between the two.

18 **Q** All right. And then what was sent in the next
19 message?

20 **A** A modified itinerary.

21 **Q** All right.

22 MR. MANGAN: If we turn to the next page, page
23 four?

24 (Government's Exhibit 77c page four was shown on the screen
25 for Jury.)

1 BY MR. MANGAN:

2 Q So at that time you had suggested a new meeting place;
3 correct?

4 A Yes.

5 Q How did that go over?

6 A Not well.

7 Q All right. Let's read the next message.

8 "Teacher, I am already in Europe and the rest of the
9 itinerary has been scheduled while in China, it would
10 be very difficult to change. If you are free on
11 Saturday or Sunday, I suggest we still meet in
12 Amsterdam?"

13 "It's better for us to talk on the phone today."

14 Then you see a reference to a phone calls?

15 A I do.

16 Q And were there phone calls at that time?

17 A Yes, there were two.

18 Q Okay. And did the Defendant have those particular
19 phone calls with the GE employee?

20 A Yes, he did.

21 Q All right. And was the F.B.I. linguist there and able
22 to listen?

23 A Yes.

24 Q Were you present as well?

25 A I was.

1 **Q** Okay. Did this still pertain to the logistics of this
2 meeting?

3 **A** It did.

4 **Q** All right. There's a follow --

5 MR. MANGAN: On next page, please?

6 (Government's Exhibit 77c page five was shown on the screen
7 for Jury.)

8 MR. MANGAN: You just leave it there.

9 **BY MR. MANGAN:**

10 **Q** There's a follow-up message saying, "Teacher, is the
11 schedule finalized?"

12 And then further down we see some additional phone
13 calls. Were there follow-up phone calls?

14 **A** Yes.

15 **Q** Okay. At least one of them is 14 minutes and
16 41 seconds; is that correct?

17 **A** It is.

18 **Q** All right. And this is March 30 of 2018; correct?

19 **A** Yes.

20 **Q** And where are you at this time?

21 **A** In my hotel room in Brussels.

22 **Q** All right. With the rest of the F.B.I. team?

23 **A** Yes, as well as a Belgium Federal Police Officer.

24 **Q** And the GE employee?

25 **A** Yes.

1 **Q** Okay. Were there continuing back -- was there a
2 continuing back and forth about where the meeting was going
3 to occur?

4 **A** Yes.

5 **Q** All right. And was that being translated by the
6 linguist?

7 **A** It was quite furiously.

8 **Q** All right.

9 MR. MANGAN: We'll turn to the next page?
10 (Government's Exhibit 77c page six was shown on the screen
11 for Jury.)

12 **BY MR. MANGAN:**

13 **Q** Does that indicate another call between the two of
14 them?

15 **A** Yes. We had quite a few.

16 **Q** All right. And then what are those follow-up items
17 that are sent from the Defendant?

18 **A** They're screen captures of train timetables for trains
19 to Amsterdam and the Netherlands.

20 **Q** All right.

21 MR. MANGAN: Let's turn to the next page to pick up
22 the chats.

23 (Government's Exhibit 77c page seven was shown on the screen
24 for Jury.)

25 **BY MR. MANGAN:**

1 **Q** "Teacher, this is the same round trip schedule between
2 Brussels and Rotterdam on April 1st. I think it's
3 convenient and you can make it in one day. Why don't
4 you book your train and we can meet somewhere near the
5 train station?"

6 **A** "Section Chief Qu, I checked, I don't have enough time
7 to travel from Brussels to Rotterdam because I will
8 need to prepare the design review for the meeting next
9 week with Safran people."

10 "Plus, Sunday is Easter, which my boss takes this
11 seriously. He has served an Easter lunch for the
12 traveling team and asked us better to attend. This is
13 why I will have time to meet you here in the Sunday
14 afternoon, but I have no time to travel to other
15 cities."

16 MR. MANGAN: Turning to next page?

17 (Government's Exhibit 77c page eight was shown on the screen
18 for Jury.)

19 THE WITNESS: "Section Chief Qu, do you have time
20 for a phone call now? I will be headed to Brussels
21 in the afternoon and I probably will not be picking
22 up calls because I will be with colleagues."

23 **BY MR. MANGAN:**

24 **Q** Did that lead to another phone call?

25 **A** Yes, it did.

1 Q And how long was that call?

2 A Three minutes and 40 seconds.

3 Q Okay. And this is, again, about the meeting place and
4 time?

5 A Yes.

6 Q Okay. At some point, did the Defendant relent and
7 agree to come to Brussels?

8 A He did.

9 Q All right. The next message. March 31st of 2018 at
10 3:20 p.m.

11 "Teacher, let's find a coffee shop around your hotel
12 at 3 o'clock tomorrow afternoon, I will contact you
13 half an hour ahead of the time. Please pay attention
14 to WeChat. There's no change over your end, right?"

15 (Government's Exhibit 77c page nine was shown on the screen
16 for Jury.)

17 **BY MR. MANGAN:**

18 Q Your response?

19 A "No change in the plan. I arrived at my hotel and the
20 room number is 421. I asked the front desk and they
21 recommended a coffee shop nearby. I walked there and
22 found this coffee shop which is very close to my
23 hotel. They have upstairs and is quiet. I think my
24 colleagues will probably not going to be there."

25 Q "Send me the name of the coffee shop."

1 **A** "Coffee shop is inside of Galleries Royales Saint
2 Hubert. I took a picture for reference."

3 (Government's Exhibit 77c page ten was shown on the screen
4 for Jury.)

5 **BY MR. MANGAN:**

6 **Q** "Okay."

7 "I will let you know when I am about to be there."

8 **A** "I will constantly check WeChat tomorrow."

9 **Q** "I checked and this coffee shop is 3.6 Kilometers away
10 from your hotel?"

11 **A** "No, my hotel is close to Central Station. The
12 address is Rue du Marche aux Here's 120,1000 Brussels,
13 Belgium, can you double check."

14 MR. MANGAN: Turning to next page?

15 (Government's Exhibit 77c page 11 was shown on the screen
16 for Jury.)

17 **BY MR. MANGAN:**

18 **Q** "Are you still at that hotel?"

19 **A** "Yes. Still at Novotel Brussels off Grand Place."

20 **Q** "Oh, I looked at the wrong one."

21 "Then let's meet at that coffee shop."

22 "I will send WeChat messages to you ahead of time."

23 MR. MANGAN: And the next page?

24 (Government's Exhibit 77c page 12 was shown on the screen
25 for Jury.)

1 THE WITNESS: "Okay, see you tomorrow."

2 **BY MR. MANGAN:**

3 Q "Okay. Keep in touch, Teacher."

4 "Teacher, we are here. Let me know when you are done
5 eating. I will meet you in front of that shop?"

6 A "I just finished eating."

7 "I am here now, are you here?"

8 Q And are these messages on April 1st, 2018?

9 A Yes, they are.

10 Q All right. And at this point was the Defendant
11 arrested?

12 A Yes.

13 MR. MANGAN: And turning to the next page.

14 (Government's Exhibit 77c page 13 was shown on the screen
15 for Jury.)

16 **BY MR. MANGAN:**

17 Q Did you send a few more messages?

18 A And we tried to call.

19 Q Okay. All right.

20 MR. MANGAN: All right. Thank you. We can take
21 that down.

22 **BY MR. MANGAN:**

23 Q Who performed the arrest, Agent Hull?

24 A Belgium Federal Police Officers.

25 Q And by way of review, what was some of the evidence

1 from Belgium that was turned over to the F.B.I.?

2 **A** There were four set of telephones, a camera, computer,
3 a variety of other electronic media, passports, things like
4 that.

5 **Q** At the time of the arrest, did they also seize an
6 amount of U.S. cash?

7 **A** Yes.

8 **Q** Do you recall how much?

9 **A** 7,000 U.S. dollars.

10 **Q** And did you obtain the devices that could store the
11 electronic files?

12 **A** Yes, we did.

13 **Q** Were those the ones that Agent Vokas testified to
14 earlier?

15 **A** Yes.

16 **Q** All right. You mentioned the four phones that were
17 turned over. We heard earlier about the one being wiped.
18 I'd like to ask you about another phone. The Huawei Mate S?

19 **A** Right.

20 MR. MANGAN: Your Honor, could we publish
21 Exhibit 6e, which has already been admitted?

22 THE COURT: Yes.

23 (Government's Exhibit 6e was shown on the screen for Jury.)

24 **BY MR. MANGAN:**

25 **Q** Do you remember what this is, Agent Hull?

1 **A** I do.

2 **Q** And what was it?

3 **A** It is a photograph of a handwritten note in Mandarin
4 characters.

5 MR. MANGAN: And if we could turn to the
6 translation?

7 (Government's Exhibit 6e page two was shown on the screen
8 for Jury.)

9 **BY MR. MANGAN:**

10 **Q** First of all, was this found on that Huawei Mate S
11 phone?

12 **A** Yes, it was.

13 **Q** All right.

14 MR. MANGAN: Now, let's take a look. If we could,
15 scroll down a little bit?

16 **BY MR. MANGAN:**

17 **Q** If you could read the items, starting at the top where
18 it says, Fan Blade.

19 MR. MANGAN: If we can scroll up a line or two?
20 Thank you.

21 (Government's Exhibit 6e page two was shown on the screen
22 for Jury.)

23 **BY MR. MANGAN:**

24 **Q** Can you read from Fan Blade down and just identify for
25 the Jury what was written here?

1 **A** "Fan blade. Alloy hollow fan blade. Composite
2 materials and size. FS blade.
3 FSS -- FS blade, Casing. Specification,
4 manufacturing, materials, structure, strength.
5 One. Specification, Standard, Overall.
6 Specific design flow, design ideas, design principle,
7 demonstration/validation steps. Internal
8 specification documents experience and lessons
9 learned.
10 A, B. Reference values. Confidence.
11 Two. Engineering manufacturing.
12 How to implement it in engineering, items to pay
13 attention to, design drawings, implementation details,
14 experimental tests, process standards.
15 Three. Materials.
16 Material, production process, material brands,
17 standards, perform parameters, test dates.
18 Four. Structural strength. Specific calculation
19 process, relevant analysis, and summary documents."

20 **Q** Agent Hull, based on the information in this document,
21 did this appear to present questions related to fan blades?

22 **A** It did.

23 **Q** And is that the specialty of the GE employee who was
24 going over there?

25 **A** Yes, it was.

1 **Q** All right. And did that relate to the same topic that
2 had been discussed all along?

3 **A** Yes.

4 THE COURT: Have we reached an appropriate break
5 moment or do you want to beg me for a few more minutes?

6 MR. MANGAN: I probably have about 15 minutes, Your
7 Honor. We can --

8 THE COURT: We're going to take our break at this
9 time. We'll break for 15 minutes. During the break, enjoy
10 the break. No talking about the case with anyone, including
11 among yourselves. No independent search. Continue to keep
12 an open mind.

13 We'll rise as you leave for 15 minutes.

14 COURTROOM DEPUTY: All rise for the Jury.

15 (Jury exited the Courtroom.)

16 THE COURT: The Jury's left the room. We're going
17 to break for 15 minutes, and then come back.

18 Mr. Kohnen, would you get your sword? Mr. Mangan
19 has made a representation to me. We're in recess.

20 COURTROOM DEPUTY: This Court is now in recess.

21 (Court was in recess at 3:50 p.m. and resumed at 4:05 p.m.)

22 COURTROOM DEPUTY: All rise. This Court in session
23 pursuant to the recess.

24 THE COURT: Thank you. Please be seated. Are we
25 ready for the Jury from the Government's perspective?

1 MR. MANGAN: Yes, Your Honor.

2 THE COURT: And the Defense as well?

3 MR. McBRIDE: Yes, Your Honor.

4 THE COURT: You still anticipate 15 minutes?

5 MR. MANGAN: Yes, Your Honor.

6 THE COURT: All right. So we're going to break --
7 I mean, it's going to be 4:25. Mr. McBride, are you willing
8 to withhold all cross-examination until Monday?

9 MR. McBRIDE: Yes, Your Honor.

10 THE COURT: Very well. Let's call for the Jury.

11 COURTROOM DEPUTY: All rise for the Jury.

12 (Jury entered the Courtroom.)

13 THE COURT: You may all be seated. The 15 Jurors
14 have rejoined us. Welcome back for testimony. The witness
15 remains under oath. You may proceed, Mr. Mangan.

16 MR. MANGAN: Thank you, Your Honor.

17 **BY MR. MANGAN:**

18 **Q** Agent Hull, I believe we were talking about some of
19 the items found in the Huawei Mate S.

20 MR. MANGAN: If we could turn and publish
21 Exhibit 6f?

22 THE COURT: Yes.

23 (Government's Exhibit 6f was shown on the screen for Jury.)

24 **BY MR. MANGAN:**

25 **Q** Is this one of the photos that was found?

1 **A** Yes, it was.

2 MR. MANGAN: And if we could turn to the
3 translation on the next page?

4 (Government's Exhibit 6f page two was shown on the screen
5 for Jury.)

6 **BY MR. MANGAN:**

7 **Q** Is this one of the documents or at least the images
8 that was found on that phone when it was seized in Belgium?

9 **A** Yes.

10 **Q** And it was addressed at least as far as the topics, it
11 has topics such as family situation, work situation,
12 information, personal needs, et cetera?

13 **A** Yes.

14 **Q** All right. Lastly, I know there was a -- for this
15 phone, there was a timeline?

16 MR. MANGAN: If we could publish Exhibit 6h?

17 THE COURT: Yes.

18 (Government's Exhibit 6h was shown on the screen for Jury.)

19 **BY MR. MANGAN:**

20 **Q** Do you recall seeing this, Agent Hull?

21 **A** I do.

22 **Q** All right. And when you looked at some of the
23 messages on this phone, were you able to see some of the
24 same communications that were leading up to the meeting?

25 **A** Yes.

1 **Q** And if we take a look at number five about part way
2 down, and we see one of the messages going out, do you see
3 the name Jerry, as who it's from?

4 **A** I do.

5 **Q** And was that one of the WeChat handles that we talked
6 about previously?

7 **A** Yes, it was.

8 **Q** Okay.

9 MR. MANGAN: If we could move forward to page four,
10 please?

11 (Government's Exhibit 6h page four was shown on the screen
12 for Jury.)

13 **BY MR. MANGAN:**

14 **Q** And looking up at the top, do you see a message from a
15 Jack to the Defendant saying, "Send me some photos when you
16 have time?"

17 **A** Yes.

18 **Q** All right. You talked earlier about the use of names
19 like Jack and Jerry and Sam?

20 **A** I did.

21 **Q** Did you see those in relation to their trip to Europe
22 in 2017?

23 **A** I did.

24 **Q** And did you see some of those same names being used in
25 chats for this trip in 2018?

1 **A** Yes.

2 **Q** All right. Now, let's turn to the 5s phone that was
3 seized in Belgium.

4 MR. MANGAN: If we could publish Exhibit 7c,
5 please?

6 THE COURT: Yes.

7 (Government's Exhibit 7c was shown on the screen for Jury.)

8 **BY MR. MANGAN:**

9 **Q** And if we take a look at the second message there
10 where it says, "This is Sam." Is that another one of the
11 names that you previously referred to?

12 **A** Yes, it is.

13 **Q** And based on the prior trip to Paris, who was Sam?

14 **A** Xu Heng.

15 **Q** All right.

16 MR. MANGAN: If we could move forward to the bottom
17 of page two?

18 (Government's Exhibit 7c page two was shown on the screen
19 for Jury.)

20 **BY MR. MANGAN:**

21 **Q** You see the message there, do you see one that says,
22 "Safety is the number one concern when you're
23 traveling, please don't push yourself too hard?"

24 **A** I do.

25 MR. MANGAN: And let's turn to the top of the next

1 page?

2 (Government's Exhibit 7c page three was shown on the screen
3 for Jury.)

4 **BY MR. MANGAN:**

5 **Q** What is the response that the Defendant sends back?

6 **A** "I put a USB drive in the eyeglass box in the middle
7 of the bookcase, and it contains some encrypted
8 documents. If something happens, someone will come to
9 you and tell you the password."

10 **Q** All right. Thank you.

11 MR. MANGAN: You can take that down.

12 **BY MR. MANGAN:**

13 **Q** Lastly, I believe there were also -- there was also a
14 phone called the Honor 7; do you recall that?

15 **A** I do.

16 **Q** And that was analyzed by Agent Vokas and yourself at
17 the F.B.I.?

18 **A** Yes.

19 **Q** All right. And in there, I believe, Agent Vokas
20 referred to some photos that were found in a file referring
21 to Tencent; do you recall that?

22 **A** I do.

23 **Q** Can you describe what was found?

24 **A** There were 200-plus photos of the GE Aviation
25 engineer's, some were of himself, others were his family, to

1 include his wife and child, his home, a variety of other
2 images in the area.

3 Q If you could --

4 MR. MANGAN: If we can show the witness Exhibit 8f?

5 THE COURT: Yes.

6 (Government's Exhibit 8f shown on the screen for the Court
7 and Witness.)

8 **BY MR. MANGAN:**

9 Q Do you recognize what Exhibit 8f is?

10 A I do. These are just a selection of a couple of the
11 photos, photographs that we identified.

12 Q About 19 of the photo, photographs?

13 A Yes, yes.

14 Q And are these photographs of the GE employee?

15 A Or his home or trips he took with his family, yes.

16 Q All right.

17 MR. MANGAN: And then if you can take a look at
18 Exhibit 8g?

19 (Government's Exhibit 8g shown on the screen for the Court
20 and Witness.)

21 **BY MR. MANGAN:**

22 Q Do you recognize what these are?

23 A Yes. These are a couple of the images that were, that
24 were identified on the Honor 7. The one on the right is
25 the, is the GE Aviation's garden at his home.

1 Q All right.

2 MR. MANGAN: We move to admit Exhibits 8f and 8g?

3 THE COURT: Any objection?

4 MR. McBRIDE: No, Your Honor.

5 THE COURT: They're admitted.

6 (Government's Exhibits 8f and 8g admitted.)

7 MR. MANGAN: Your Honor, we'd like to publish these
8 to the Jury by hand as opposed to putting them on the
9 screen, if that's possible?

10 THE COURT: Any objection?

11 MR. McBRIDE: No, Your Honor.

12 THE COURT: Yes, you may proceed in that way.

13 MR. MANGAN: May I personally distribute them?

14 THE COURT: Yes. There are two packets?

15 MR. MANGAN: There are two different exhibits.

16 THE COURT: And are there --

17 MR. MANGAN: There's a collection of each.

18 THE COURT: What?

19 MR. MANGAN: Each of the two exhibits is being
20 handed out.

21 THE COURT: The front row's passing something to
22 the back row, and the back row is passing something to the
23 front row. Is that the way it's supposed to work, Mr.
24 Mangan?

25 MR. MANGAN: Yes, I started one at each end.

1 THE COURT: Okay.

2 MR. MANGAN: It may or may not have been a way to
3 go. I think we're almost there.

4 THE COURT: We're doing fine.

5 MR. MANGAN: I think we're ready to proceed, Your
6 Honor.

7 THE COURT: Very well.

8 **BY MR. MANGAN:**

9 Q Agent Hull, now that the Jury can view it. Looking at
10 Exhibit 8f, once, again, is that the UFED Report related to
11 selection of photos?

12 A Yes, it is.

13 Q And on there does it describe a path for these photos?

14 A It does.

15 Q And does that path -- you see it close-up there.
16 There's a reference to Tencent?

17 A I do.

18 Q All right. Were you able to determine the source of
19 these photos? In other words, how the Defendant got the
20 personal photos of the GE employee?

21 A Yes.

22 Q Can you explain?

23 A They were collected from the GE employee's qq and
24 WeChat profiles.

25 Q What company owns WeChat?

1 **A** Tencent.

2 **Q** And what company owns qq, if you know?

3 **A** Tencent.

4 **Q** And does that correspond with the file path that is
5 indicated?

6 **A** It does.

7 **Q** And once, again, looking at 8g, is this just a
8 selection of the photos?

9 **A** Yes, it is.

10 **Q** Approximately how many photos were found?

11 **A** A little north of 200.

12 **Q** And these photos were on the phones brought to the
13 meeting in Brussels?

14 **A** Yes.

15 **Q** As a counterintelligence agent, what was the
16 significance to you that the Defendant had personal photos
17 of the GE employee when he arrived?

18 **A** Interpretation we made that if he failed to continue
19 to cooperate, they would be used to leverage his continued
20 cooperation.

21 MR. MANGAN: No further questions, Your Honor.

22 THE COURT: Very well. Thank you.

23 MR. MANGAN: And, Your Honor, at the conclusion, we
24 would ask that the exhibits stay here, please.

25 THE COURT: Do you want to pick them up yourself

1 or --

2 MR. MANGAN: I can do it myself. That's fine.

3 THE COURT: I just as soon see that happen. Why
4 don't you pick them up.

5 (Mr. Mangan retrieved Government Exhibits 8f and 8g from the
6 Jurors.)

7 THE COURT: Jurors have returned all copies of
8 those two exhibits to the Government.

9 The Government has completed its direct examination
10 of this witness. The Defense will have an opportunity to
11 ask questions of this witness subsequently called
12 cross-examination.

13 It's time to break for the day -- TGIF. I want to
14 thank you for your attention and hard work. I want to urge
15 you to take a break this weekend. Not discuss this case
16 with anyone -- particularly loved ones at home.

17 Don't discuss it among yourselves. No independent
18 research. Avoid any news that I don't anticipate and enjoy
19 the weekend. I intend to.

20 Out of respect for you, we'll rise as you leave.
21 Meet you back at, at 9:15 on Monday.

22 COURTROOM DEPUTY: All rise for the Jury.
23 (Jury exited the Courtroom.)

24 THE COURT: The Jury's left the room. The door is
25 closed. Is there anything that requires the Court's

1 attention before we recess for the weekend from the
2 Government?

3 MR. MANGAN: One request, Your Honor. Regarding
4 those two exhibits, 8f and 8g, as it pertains to the public
5 record, we ask that they be sealed.

6 THE COURT: Any objection?

7 MR. McBRIDE: No, Your Honor.

8 THE COURT: So ordered.

9 MR. MANGAN: Nothing further.

10 THE COURT: Anything from the Defense?

11 MR. McBRIDE: No, Your Honor.

12 THE COURT: I want you lawyers to try and take
13 advantage of the weekend. I'm impressed with your work.

14 Sir, no discussion of your testimony over the
15 weekend. I want you to get some rest too.

16 We're in recess until Monday until 9:30.

17 COURTROOM DEPUTY: This Court is now in recess.

18 (The trial was recessed at 4:22 p.m.)
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1 CERTIFICATE OF REPORTER

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3 I, Julie Hohenstein, Federal Official Realtime
4 Court Reporter, in and for the United States District Court
5 for the Southern District of Ohio, do hereby certify that
6 pursuant to Section 753, Title 28, United States Code that
7 the foregoing is a true and correct transcript of the
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9 above-entitled matter and that the transcript page format is
10 in conformance with the regulations of the Judicial
11 Conference of the United States.

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16 s/Julie Hohenstein December 3, 2021

17 **JULIE HOHENSTEIN, RPR, CRR, RMR**

18 FEDERAL OFFICIAL REALTIME COURT REPORTER
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